

## Appendix E: Response to Comments

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The following are comments from the letters and emails received and our responses to those comments. Comments are grouped by topic. The bracketed numbers following each comment indicate who made the comment based on the list attached at the end of this appendix.

### Adding Routes and Areas

**Public comment:** A number of respondents thought that we should not add any more routes due to the inability of the Klamath National Forest (KNF) to maintain the current National Forest Transportation System (NFTS) [Form Letter (FL) 2, 74, 172, 321-416, FL 418].

**Response:** Alternatives 2, 4, 5, 6 and 7 add a range of miles of unauthorized routes to the National Forest Transportation System (NFTS), ranging from about 7 miles in Alternative 4 to 92 miles in Alternative 2. Of the road miles added, in most alternatives (Alternatives 5, 6, and 7) the majority of roads are short spurs to dispersed recreation sites that need little if any active maintenance. The Forest has been able to maintain its maintenance level (ML) 3, 4 and 5 routes within existing budgets. Maintenance level 1 roads are closed to public use and require little maintenance. The majority of KNF roads are ML 2 roads which are roughly-graded and maintained for high clearance vehicles. Most of these roads are maintained as needed to support KNF projects or provide access to recreation sites. Decisions are made annually about which of the approximately 2,700 miles of ML 2 road need maintenance; not all will be maintained each year and some may be left closed by rocks or downed trees. The deferred maintenance strategy (described in Appendix C of the FEIS) allows the KNF to effectively use its annual maintenance budget to adequately maintain the current road system. The routes to be added as motorized trails will be maintained through the Recreation program. The KNF expects to secure state funds for part of the maintenance costs for these trails. Most of the unauthorized routes proposed for addition to the NFTS are stable and require little to no active maintenance to provide protection to KNF resources as discussed in the Transportation section of Chapter 3 and Appendix C of the FEIS. Some action alternatives will result in reduced annual maintenance costs (Alternatives 3, 4 and 7) as disclosed in the Transportation section of Chapter 3 of the FEIS.

**Public comment:** Some respondents stated that the proposed action and alternatives (2, 5, and 6) added too many miles of route to the NFTS [17, 74, 17]; others wanted more miles of routes added [20, 203, 417]; and one respondent said Alternative 6 added the correct number of miles [178].

**Response:** There is disagreement among segments of the public about whether routes should be added to the NFTS, and the number and types of routes needed. The Forest Supervisor is

charged with making decisions regarding an appropriate balance between motorized and non-motorized recreation, and will do so through this travel management process. There appears to be general agreement by various segments of the public that some level of motorized access to dispersed recreation sites is appropriate; Alternatives 2, 4, 5, 6 and 7 provide different levels of opportunity for this access. At this time, the KNF does not have any designated trails for motorized vehicle use, other than for over-snow vehicles. Alternatives 2, 4, 5, 6 and 7 would provide such trail opportunities. Alternatives 4, 5, 6, and 7 were developed using public input to provide different balances between motorized and non-motorized use. In making a decision on potential additions to the NFTS, the Forest Supervisor will consider factors such as safety, law enforcement, costs, user conflicts, public opinion and desires, resource impacts, and motorized and non-motorized opportunities. The FEIS addresses all of these factors.

**Public comment:** Several respondents thought that all or most of the unauthorized routes should be added to the NFTS [20, 203, 417]; others opposed adding any unauthorized routes to the NFTS [173, 321-416, FL 418]; and a number opposed adding routes in specific areas (riparian reserves, key watersheds, salmon spawning areas, and other special areas) [FL 2, 46, 171, 172].

**Response:** All publicly-identified inventoried unauthorized routes (497 miles) were evaluated against many different possible resource opportunities and concerns during Steps 1 - 3 of this travel management project to determine if they should be added to the NFTS; this is discussed in Chapters 1 and 2 of the FEIS. If it was determined that the route would cause major environmental impacts to resources that could not be mitigated, the route was not proposed for addition to the NFTS in any action alternative. In this case, it was determined that the amount of harm caused by its inclusion in the NFTS would outweigh the benefit of the addition. Routes that emerged from this screening as potential additions to the NFTS were field verified, and some were found to be no longer identifiable on the ground or not useable for any motorized access. Detailed route-by-route analysis of the routes that passed initial screening is available in the project record for Travel Management, located in the Forest Supervisor's Office in Yreka, CA.

The displays of where routes were proposed for addition in riparian reserves, near salmon-bearing streams, or other special interest areas were not consistently clear in the DEIS. In response to public comment, an analysis of proposed additions to the NFTS in key watersheds is included in the Hydrology and Fisheries sections of Chapter 3 of the FEIS. The FEIS clarifies the proposals as to effects on riparian reserves and key watersheds in the Hydrology section of Chapter 3, on salmon-bearing streams in the Fisheries section of Chapter 3, and on special interest areas in Geology and Botany sections of Chapter 3. Alternative 7 was developed in part to address the concerns expressed in public comment on the DEIS to evaluate and remove from consideration those routes that would have a negative

effect on salmon spawning. Effects of adding unauthorized routes in action alternatives 2, 4, 5, 6, and 7 are discussed by the resource area potentially affected in Chapter 3 of the FEIS.

Other than routes in the Humbug drainage, proposed additions to the NFTS on the west side of the KNF in Riparian Reserves all access dispersed recreation sites (short spurs off NFTS roads). About 60 spurs to access dispersed recreation sites are river access points or sites in the vicinity of rivers or streams, used primarily by SUVs or 4WD trucks. Effects of proposed additions to the NFTS in riparian reserves on both the west and east sides of the KNF are disclosed in the Hydrology section of Chapter 3 of the FEIS. The Humbug drainage is discussed in the response to the following comments.

**Public comment:** One respondent stated support for adding areas that have already been heavily used by OHVs [74]; another respondent supported the addition of the Humbug open area [199]; a respondent representing several organizations questioned the addition of the Humbug area due to potential soil erosion [172].

**Response:** The effects of adding open riding areas are analyzed and disclosed in various resource sections of Chapter 3 of the FEIS for action alternatives 2, 5, 6, and 7. Part of the area proposed to be designated as open for OHV use in Humbug is a flat created by a mining operation in the distant past as discussed in various sections (primarily Transportation, Soils, and Hydrology) of Chapter 3 of the FEIS. The flat area is actually physically lower than Humbug Creek and separated from it by a road. Any sediment created by use of the flat or the hills above will be funneled onto the flat and would not enter the creek. While the flat itself is within the boundaries of a riparian reserve, it does not support riparian vegetation. The Humbug drainage supports a network of old mining and logging routes that were constructed in erodible soils; most of these routes will remain on the landscape whether or not they are designated as part of the NFTS. More information on the effects of what is proposed for the Humbug drainage, and site-specific mitigations to reduce the effects of adding routes, is provided in the Soils section of Chapter 3 of the FEIS.

**Public comment:** One respondent stated that unauthorized routes should not be added to the NFTS because adding them would reward users who had created them illegally [74].

**Response:** Because 1.2 million acres of the KNF have been open for motorized vehicle use under the KNF Forest Plan (LRMP), unauthorized routes on these acres were not created illegally.

## **Adequacy of Analysis**

**Public comment:** A number of respondents stated that the Forest must do a travel analysis and identify the minimum NFTS for the KNF [172, 205, 321- 416, 418].

**Response:** Forest Service Manual 7712 (1) states “...travel analysis is not required to inform decisions related to the designation of roads and trails for those administrative units and ranger districts that have issued a Proposed Action as of January 8, 2009.” Nothing in the travel management regulations at 36 CFR 212 requires that travel analysis must be completed before roads and trails on National Forest System lands are designated for motor vehicle use in accordance with Subpart B of the Travel Management Rule (36 CFR 212.50). The requirement for identification of the minimum NFTS for the KNF is discussed further in this response to comments under the Alternatives section.

**Public comment:** Some respondents requested that the KNF provide information on decisions made to designate the NFTS [202] including the resource impacts of the NFTS [172].

**Response:** Implementing Subpart B of the Travel Management Rule does not require the review and inventory of all past transportation decisions (36 CFR 212.50, paragraph (b)). Similarly, the Forest Service Manual 7715.03 – Policy (1) states that the Forest must use previous decisions to establish a starting point for proposals to change travel management decisions. This process does not address the impacts of the NFTS; that is outside the scope of the project.

**Public comment:** One respondent representing several organizations suggests that no decisions should be made until the Forest completes a comprehensive inventory of all roads, trails, temporary roads and user created routes [172].

**Response:** The KNF conducted an extensive effort to inventory the unauthorized routes on the Forest that were continuing to receive motor vehicle use, as discussed in Chapter 1 of the FEIS. An inventory of NFTS routes and temporary roads is not required for the travel management decision to be made under Subpart B of the Travel Management Rule. Temporary roads are not public access routes; they are not considered available for motorized vehicle use by the public.

## Air Quality

**Public comment:** Some respondents expressed concern with effects of motorized use on climate change, greenhouse gases and asbestos dust in the air [172, 365].

**Response:** The effect of motorized use on climate change, including the production of greenhouse gases, is discussed in the Air Resources section of Chapter 3 of the FEIS. The number of vehicle miles traveled annually by Forest users is low, as discussed in the Transportation, Recreation, and Society, Culture and Economy sections of Chapter 3 of the FEIS, and is not expected to change in any action alternative that prohibits cross-country travel and redirects motorized use onto designated routes. Therefore, no change is anticipated from this decision that will adversely affect air quality or greenhouse gas emissions. The

likelihood of asbestos dust being produced from the mixed use proposed by this analysis is discussed in the Geology section of Chapter 3 of the FEIS. The highest potential for exposure to asbestos dust would come from traveling at high speeds in an open vehicle on a road with asbestos-bearing ultramafic rock. This kind of situation would occur on Maintenance Level (ML) 3 roads, which are constructed for higher speeds. All ML 3 roads in ultramafic rock that are proposed for mixed use were tested for the presence of asbestos. Test results indicate that asbestos levels are within limits established by the State of California; asbestos does not constitute a health hazard. Routes to dispersed recreation sites were not tested because the low traffic speeds on these short, roughly-surfaced spur roads would not generate enough dust to be a problem.

## Alternatives

**Public comment:** Several respondents requested a new alternative be developed that provides a better balance of motorized access, affordability and environmental protection [20, 203].

**Response:** No information was provided in the comment that would clarify what a “better balance” might look like. Alternative 7 was developed in response to comments on the DEIS, to provide a balance of types of access being provided, affordability and environmental concerns expressed in public comments on the DEIS. Alternative 7 is described in Chapter 2 of the FEIS.

**Public comment:** One respondent requested a display of how the minimum road system was identified and used to develop alternatives [205]; another stated that the range of alternatives was artificially constrained to avoid looking at the effects of the current NFTS [172].

**Response:** Identification of the minimum road system is not required under Subpart B of the Travel Management Rule, is not a factor in this travel management process, and is not used to develop alternatives; doing so is outside the scope of this analysis. The range of action alternatives was developed to respond to the purpose and need for action to prohibit cross-country motorized travel and identify needed changes to the KNF NFTS to provide motorized recreation opportunities while protecting KNF resources. See further discussion in the response to comments in the purpose and need section.

**Public comment:** A number of respondents thought the travel management decision should consider road closures on the NFTS to protect resources [FL2, 17, 172, 205], and some respondents suggested that decommissioning was the way to accomplish such road closures [FL2, 17, 172].

**Response:** The purpose and need for the travel management project is identified in Chapter 1 of the FEIS. The proposed action (Alternative 2) and action alternatives were developed to meet the requirements of Subpart B of the Travel Management Rule. The Rule provides

direction for a system of National Forest Transportation System roads, trails, and areas designated for motor vehicle use, and the prohibition of motor vehicle use off designated roads and trails and outside designated areas. Subpart B is intended to prevent resource damage potentially caused by unmanaged motor vehicle travel by the public. Therefore, comprehensive change to managed motorized vehicle use on NFTS roads is beyond the scope of this analysis.

**Public comment:** Several respondents request a reconsideration of Alternative B (an alternative eliminated from detailed study) to allow motorized use on some non-motorized trails (the trails are specified in one comment) [201, 203]; other respondents do not want motorized use on the same specified non-motorized trails [199, 200] or on any non-motorized trails [177, 321-416, FL 418], and stated that the demand for loop roads and access to high points was adequately satisfied by the proposed action [200].

**Response:** Allowing motorized use on non-motorized trails was discussed in an alternative considered but eliminated from detailed study (Alternative B) in Chapter 2 of the FEIS. This alternative does not meet the purpose and need for this project, and was eliminated from detailed study because of potential user conflicts and safety concerns. Non-motorized trails on the KNF were not intended for motorized use and would require engineering review, redesign, and potentially substantial reconstruction to accommodate that use. None of the alternatives considered but eliminated from detailed study will be selected for implementation.

**Public comment:** Several respondents suggest that, since the KNF has not included alternatives that consider road closures on the NFTS, a full range of alternatives has not been evaluated [172, 205].

**Response:** The purpose and need for action determines the range of alternatives considered in detail in the FEIS. The purpose and need for the current action is to address unmanaged cross-country travel and to implement Subpart B of the travel management regulations, while maintaining important motorized access and recreational opportunities for the public. The purpose and need for action is not to examine the NFTS for potential road closures; that action is outside the scope of this analysis.

## Aquatics and Fisheries

**Public comment:** A number of respondents are concerned about the effects of motorized use of routes on fish, particularly spawning for Threatened, Endangered and Sensitive (TES) species including the salmon [FL 2, 17, 46, 172, 204, 324, and 387].

**Response:** The effects of motorized use of routes are discussed in detail in the Fisheries section of Chapter 3 of the FEIS, and in the Fisheries Biological Assessment and Biological

Evaluation (Fish BA/BE). Informal consultation with the National Marine Fisheries Service (NOAA-Fish) based on the Fish BA/BE concluded with a “may affect individuals, is not likely to affect populations” determination. The results of consultation, and Fish BA/BE, are referenced in the Fisheries section of Chapter 3 of the FEIS and are part of the project record located in the KNF Supervisor’s Office in Yreka, CA. Clarification of where motorized use will be allowed and discussion of the potential effects on fish of routes that are designated near or crossing streams is also found in the Fisheries section of Chapter 3 of the FEIS. A commitment to monitoring the effects on Middle Fork Humbug Creek of the crossings proposed in action alternatives is identified in Chapter 2 of the FEIS. Site-specific mitigations to reduce or eliminate negative effects on fish are documented in the Soils section of Chapter 3 of the FEIS.

**Public comment:** Concern was expressed by a respondent representing several organizations about how route designation decisions will minimize impacts on hydrological sensitive areas and riparian reserves [172].

**Response:** Effects of route designation decisions on riparian reserves are discussed in the Hydrology, Fisheries and Terrestrial Wildlife sections of Chapter 3 of the FEIS. Riparian reserves, the term used and defined in the KNF LRMP, is synonymous with the term “hydrological sensitive areas” for the KNF and the travel management project as discussed in the Hydrology section of Chapter 3 of the FEIS. See also the discussion of minimizing effect in the response to the comment on Executive Orders.

**Public comment:** A group respondent expressed concern that the KNF has too many problem roads that impact fish and stated the group is strongly opposed to KNF adding unauthorized routes to the NFTS within or adjacent to riparian reserves or within known or historically occupied TES and MIS habitats for Southern Oregon/Northern California Coasts Coho Salmon, Upper Klamath-Trinity Rivers Chinook Salmon, Steelhead, and Rainbow Trout [46].

**Response:** Threats to fisheries from cross-country motorized travel would be eliminated for the KNF with the prohibition of such travel, as stated in the Fisheries section of Chapter 3 of the FEIS and the Fish BA/BE. Motor vehicle use levels on the KNF are very low and impacts are dispersed across the landscape. It is unlikely that effects of off-road use or use of additional roads added in action alternatives 2, 4, 5, 6, or 7 will be measurable or discernable from the multiple natural and human-induced changes that occur over the landscape on the KNF. Most of the roads being proposed for addition to the NFTS in riparian reserves are short spurs accessing dispersed recreation sites that have little or no impact on fish. The majority of the unauthorized routes in riparian reserves are being closed to motorized vehicle travel in all action alternatives (from 66% to 100%). See also the response to the first comment in this section of responses.

**Public comment:** One respondent representing a number of organization states that the Forest Service must manage public lands in an ecologically sustainable manner that protects fish and wildlife. 36 CFR 219.27(a)(4)(1982). The agency must also show how it is protecting these resources [172].

**Response:** As discussed in the Fisheries section of Chapter 3 of the FEIS, all of the action alternatives represent substantial reductions in road mileage in riparian reserves. Reductions in road density would occur in most watersheds for all action alternatives as disclosed in the Hydrology section of Chapter 3 of the FEIS. Compliance with law, regulation and policy is also disclosed in the Fisheries and Hydrology sections of Chapter 3 of the FEIS. The Fisheries section of Chapter 3 of the FEIS and the Fish BA/BE emphasize the ways in which fish are being protected in action alternatives, and site-specific mitigations listed in the Recreation and Soils sections provide additional protections.

**Public comment:** One respondent representing several organization states that the KNF has elected not to address and mitigate the harmful impacts detailed in the Trombulak and Frissell (2000) article [172].

**Response:** The information provided in the Trombulak and Frissell (2000) article was used as part of the analysis of project effects on fisheries resources, and is referenced in the Fisheries section of Chapter 3 of the FEIS. All action alternatives address the issues raised by Trombulak and Frissell by reducing the number of miles and acres available for motorized use on the KNF.

**Public comment:** One respondent representing several organization states that proposals in action alternatives that add motorized use routes to the NFTS within SONCC habitat, and add stream crossings on these routes, run afoul of the KNF LRMP at MA 10-22, MA 10-45, and MA 10-55. Furthermore, the comment states the decision to encourage riparian ORV use in SONCC habitat may result in “take” violating the ESA, and that the “Not likely to adversely affect” (NLAA) determination on page 151 of the DEIS is directly refuted by numerous findings contained in the document [172].

**Response:** In the DEIS, a number of perennial stream crossings were identified in action alternatives (0 to 18 depending on the alternative) by overlaying the proposed routes with the special status fish species distribution layer in GIS. Field verification of these crossings between DEIS and FEIS found the actual numbers were 0 to 3 for action alternatives; the Fisheries section of Chapter 3 of the FEIS has been modified to include the results of the field verification and site-specific mitigations added to reduce or eliminate effects have been added to the Soils section of Chapter 3 of the FEIS. In informal consultation concerning effects of this project on fisheries, the determination was made that implementation of any action alternative “may affect, but is not likely to adversely affect” SONCC Coho Salmon (see the



Determinations for Special Status Species in the Fisheries section of Chapter 3 of the FEIS). Action alternatives are in compliance with the KNF LRMP including the standards cited in the comment. See also the response to the first comment in this section of responses.

**Public comment:** On respondent representing several organizations states that the proposal at page 133 of the DEIS to add motorized roads and trails directly adjacent to anadromous fish habitat in six 7<sup>th</sup> field watersheds constitutes a violation of the ESA, CWA, NWFP and the KNF LRMP. The organizations are perplexed by the willingness of the KNF to sacrifice anadromous fish habitat to facilitate the 1.1% of forest users for whom ORV use constitutes their primary activity on public lands [172].

**Response:** All action alternatives propose closing most of the unauthorized routes (from 66% to 100%) in riparian reserves as discussed in the Hydrology and Fisheries sections of Chapter 3 of the FEIS. Most of the added routes in anadromous fish habitat are short spurs to dispersed recreation sites, as discussed in the Fisheries section of Chapter 3 of the FEIS. Aquatic Conservation Strategy objectives are met and the action alternatives all are in compliance with the CWA and KNF LRMP in this regard as discussed in the expanded Hydrology section of Chapter 3 of the FEIS. The contribution to sediment loading from these routes is considered minimal, and is immeasurable at the watershed scale, as noted in the Fisheries section of Chapter 3 of the FEIS.

## Baseline

**Public comment:** One group of respondents suggests that the Forest Service has not provided adequate or reliable documentation for what they consider to be the "baseline" of the current transportation system. The Forest has not provided decision notices, records of decision, NEPA documentation, road management objectives, or funding allocation data for system routes in its jurisdiction [172].

**Response:** This project does not analyze the impacts of the current transportation system. That analysis is outside the purpose and need for this project, and outside its scope. The Pacific Southwest Regional Forester has committed to begin addressing Subpart A of the Travel Management Rule within the next 18 months; that process will provide information needed to identify the baseline transportation system for management of the KNF.

**Public comment:** One respondent representing several organizations stated that relying on the No Action Alternative as a proxy for conducting the analysis of cumulative impacts of past travel management action is misplaced. For instance, the cumulative impacts of the 1996 flood event are largely absent from the DEIS [172].

**Response:** Cumulative impacts of past events are expressed in the potentially affected environment as part of the current condition. For example, the effects of a flood from 13 years ago are encompassed in the description of the current condition of the stream channels and the condition of their riparian vegetation as discussed in the Hydrology and Fisheries sections of Chapter 3 of the FEIS.

## Big-Game Retrieval

**Public comment:** Several respondents requested that big game retrieval using motorized vehicles be allowed [20, 179, and 417]. One group was concerned that not allowing motorized vehicle use for retrieving game animals was unfair to the elderly and disabled hunters [179]. There was also a suggestion to clarify the direction in the FEIS regarding use of motorized vehicles to retrieve game animals [417].

**Response:** Forest Service Manual 7715.74 (3) states “[t]o promote consistency, the Regional Forester should coordinate designations pursuant to Forest Service Manual 7715.74, paragraph 1, within states and among adjoining administrative units.” The Regional Forester for the Pacific Southwest Region (California) has determined that Forests in the region shall not allow cross-country use of motorized vehicles to retrieve game animals. Therefore, the environmental impact of cross-country motorized vehicle travel to retrieve game is not considered in the FEIS. Big game retrieval can still occur without the use of motorized vehicles throughout the KNF wherever hunting of game is allowed by the states of California and Oregon. Denying motorized access to the disabled and elderly is not considered discriminatory under the Americans with Disabilities Act or the Older Americans Act as long as this denial applies to all others.

## Botanical Resources

**Public comment:** One respondent requested that the Forest Service responsibly limit where OHV use takes place when such use causes negative impacts to plants [74]; others requested protection for threatened, endangered and sensitive plant species [321-416, FL 418]. One respondent representing several organizations expressed concerns that a substantial number of unauthorized routes were proposed for addition to the NFTS in habitat for sensitive plant species, and that studies strongly suggest that designation of additional system roads near sensitive plant habitat via the MVUM will result in foreseeable direct, indirect and cumulative impacts to rare botanical resources that are not disclosed or analyzed in the DEIS [172]; and one respondent stated that Alternative 6 protected plants well [178].

**Response:** As disclosed in the Botanical Resources section of Chapter 3 of the FEIS, all action alternatives have been designed to limit where OHV use takes place to minimize impacts to sensitive plant species. Implementation of any action alternative would prohibit cross-country motorized travel, considerably reducing the area available for OHV use and

thus reducing potential impacts to plants. The number of sensitive plant sites within 100 feet of unauthorized route proposed for addition to the NFTS in any action alternative varies from zero to two. None of the sites is directly adjacent to a route; disturbance actually creates habitat for one of these species and the effects on the other species were evaluated and found to not be affected by the use of the route. Direct, indirect and cumulative effects to rare botanical resources were analyzed and disclosed in the Botanical Resources section of Chapter 3 of the FEIS. It is not clear what studies are being referenced by the comment or which effects were not disclosed. No information is available that leads the KNF to the conclusion that impacts are not disclosed or analyzed. A Biological Assessment and Evaluation (Plant BA/BE) was prepared and all action alternatives were found to benefit plant species. This information is available in the project record located at the KNF Supervisor's Office in Yreka, CA.

**Public comment:** One respondent representing several organizations expressed concern that the harmful impacts of travel management detailed in the Trombulak and Frissell (2000) article are not addressed and mitigated [172].

**Response:** The information provided in the Trombulak and Frissell (2000) article was used as part of the analysis of project effects on botanical resources, and is referenced in the Botanical Resources section of Chapter 3 of the FEIS and in the Plant BA/BE. All action alternatives address the issues raised by Trombulak and Frissell by reducing the number of miles and area available for motorized use on the KNF.

**Public comment:** One respondent representing several organizations noted that the Forest Service must manage public lands in an ecologically sustainable manner that protects the diversity of plant communities and must show how it is protecting these resources [172].

**Response:** Managing for diversity is part of the KNF LRMP standards and guidelines. All travel management alternatives will be compliant with the KNF LRMP as amended, as stated in the Botanical Resources section of Chapter 3 of the FEIS.

**Public comment:** One respondent representing several organizations expressed concern that the DEIS did not analyze or disclose the potential for increased OHV abuse of serpentine sites due to the addition of unauthorized routes to the NFTS; this concern is that the destruction of rare plants by motor vehicles is a direct impact that cannot be mitigated and may contribute to the need for ESA listing, that ruts, rills and gullies persist in serpentine areas for decades (in violation of the ACS) and prevent re-establishment of desired rare species via permanent soil damage [172].

**Response:** As noted in the Botany section of Chapter 3 of the FEIS, only one sensitive plant on serpentine soil exists within 100 feet of a route proposed for addition to the NFTS and that plant (Klamath Mountain buckwheat) occurs more than 100 feet from a short (0.04 mile)

access route to a dispersed recreation site. It is unlikely the plant has been or will be affected by the use of this access route. Prohibition of cross-country motorized travel will eliminate the other impacts mentioned in the comment.

**Public comment:** One respondent representing several organizations is concerned with the statement that one plant (*Meesia uliginosa*) is not likely to be disturbed if vehicles remain on designated routes and avoid wet fens because a sizeable portion of OHV users seek out and recreate in wet meadows and fens [172].

**Response:** As stated in Chapter 1 of the FEIS, this project proposes to clarify where motorized use may occur on the KNF and where it is prohibited. The MVUM, educational materials, and law enforcement will be used to encourage motorized user to remain on authorized NFTS routes and areas. Illegal use may damage resources but such use is unpredictable and cannot be assumed; monitoring the effects of the travel management decision will allow mitigation to be employed as detailed in Chapter 2 of the FEIS. Most OHV users are law-abiding and will comply with rules and regulations.

**Public comment:** One respondent representing several organizations requests that the BMPs developed by the Wild Utah Project be adopted in the KNF travel planning effort; if these recommendations are not used, explain why not [172].

**Response:** The document “Best Management Practices for Off-Road Vehicle Use on Forestlands (Wild Utah Project 2008) outlines recommendations for location and management of routes open to OHV use. The document is comprehensive, covering Soils, Vegetation, Wildlife, Special Ecosystems, and Use Conflicts. The KNF travel management project has incorporated many of the suggestions from this document in its process. Many of the Planning and Decision-making Best Management Practices (BMPs) were used in the original screening of routes for suitability for inclusion in the NFTS. Almost 350 miles of routes were not considered in an action alternative because they were found to have resource conflicts that could not be adequately mitigated, as disclosed in Chapter 1 of the FEIS. Many of the BMPs for Soils, Vegetation, Wildlife and Special Ecosystems were applied to this project. The extensive recommendations for monitoring and those for restoration of disturbed lands were not incorporated because they are outside the scope of this project. While the Utah Wild document provides excellent guidance, it is not considered direction for National Forest management and there is no requirement to use it in its entirety to guide the KNF travel management process.

**Public comment:** One respondent representing several organizations is concerned that reliance on monitoring and mitigating damage after it occurs will not achieve the KNF LRMP and NFMA goals to maintain viability [172].

**Response:** As stated in the Botanical Resources section of Chapter 3 of the FEIS, action alternatives were designed to avoid effects to sensitive plant species occurrences. Monitoring and mitigation are to ensure that, if the situation changes in the future, changes can be made to protect these species. Compliance with LRMP and NFMA goals are disclosed in the Botanical Resources section of Chapter 3 of the FEIS.

**Public comment:** One respondent representing several organizations states the Forest Service is required to conduct a botanical investigation and prepare “Species Management Guides” for sensitive species, prioritized based on threats due to management activities, before the impacts of the travel management actions can be accurately assessed (FSM 2670.22 and 2672.4) [172].

**Response:** No “Species Management Guides” are required by FSH 2670.22 and 2672.4. To respond to the requirements of these directives, the Pacific Southwest Region (Region 5) of the Forest Service and the KNF have developed management practices and management objectives to maintain populations of native plant populations and to ensure species do not become threatened or endangered because of Forest Service actions. Effects to all sensitive species are analyzed in a biological evaluation per direction in FSH 2672.4. A Plant BA/BE has been prepared for this project and is in the project record located at the KNF Supervisor’s Office in Yreka, CA. The determination is that effects from the action alternatives are beneficial to all species due to the prohibition of cross-country motor vehicle travel. In relation to botanical investigations, the Region 5 Threatened and Endangered Plants Program Handbook states that the Regional Sensitive Plant Program is the basis for implementation of the Forest Service TES program in this Region. It requires a three-phased approach to the conservation of each listed or sensitive species: inventory, interim management, and recovery management. Most sensitive species are in the interim management phase, which does not require recovery plans but does require biological investigations, field reconnaissance, impact evaluations and other protective actions. These actions have been performed and are documented in the Botanical Resources section of the FEIS and the Plant BA/BE.

**Public comment:** One respondent representing several organizations indicates that the FS Threatened and Endangered Plants Program Handbook requires recovery plans to be made for sensitive plant species, aimed at achieving the goal of removing the species from sensitive/threatened status as soon as possible. Activities near populations of these rare plants should therefore be devised in order to improve and enhance their habitat, not to destroy them. Lacking substantive biological information about the trends, status, and threats to these species on federal and private lands, the FS is simply guessing at the possible impacts from this project [172].

**Response:** Developing recovery plans for federally listed species is the responsibility of the USFWS. Federally listed species considered on the KNF are addressed in the Botanical

Resources section of Chapter 3 of the FEIS and in the Plant BA/BE which is part of the project file located in the KNF Supervisor's Office in Yreka, CA. There are no unauthorized routes proposed for addition to the NFTS within 100 feet of any of the four federally listed species. One candidate for federal listing occurs on the KNF within 100 feet of unauthorized routes currently being used by motorized vehicles. Those routes are not proposed for addition to the NFTS under any of the action alternatives. Federal regulations do not require recovery plans for sensitive species.

## Climate Change

**Public comment:** One group suggests that the DEIS violates NEPA by failing to analyze the impacts of climate change [172]. Another respondent asks that the FEIS include a discussion of climate change and its potential effects on the Forest as it relates to the route designation decision and the National Forest Transportation System [205].

**Response:** This action is focused on managing where motor vehicles travel. This action does not regulate the number of vehicles on NFS lands. The regulation of emissions is not within the jurisdiction of this agency. The KNF acknowledges that climate change has the potential to affect resources on the forest. These effects are discussed in Chapter 3 of the FEIS, in the Botanical Resources, and the Air Resources sections.

## Coordination with other governmental agencies

**Public comment:** One respondent requests that the KNF add more motorized mixed use routes to make loop opportunities if Siskiyou County sets policy that would allow non-highway legal vehicles on non-paved County roads [59]; a respondent representing Siskiyou County explains the County's lack of formal policy to this date, and expresses the desire for continued coordination between the KNF and the County [417].

**Response:** Coordination with Siskiyou County concerning travel management is ongoing and will continue as discussed in the Transportation section of Chapter 3 of the FEIS. The KNF will continue to look for additional loop opportunities and consider modifications to the travel management decision based on appropriate environmental analysis and disclosure as discussed in Chapter 2 of the FEIS. One loop opportunity considered in this project is opening the loop around Doe Peak to public motorized use.

## Cross-Country Travel

**Public comment:** One respondent states that cross-country travel should be allowed on the KNF because negative effects are minimal and families enjoy it [59]; another respondent says cross-country travel should be prohibited only where erosion occurs [171]. Other respondents support the prohibition of cross-country travel [17, 74, 177, 321-416, and FL 418].

**Response:** Across the nation, unmanaged motor vehicle use, particularly OHV use, has resulted in unplanned roads and trails, erosion, watershed and habitat degradation, and impacts to cultural resource sites. Compaction and erosion are the primary effects of motor vehicle use on soils. Riparian areas and aquatic-dependent species are particularly vulnerable to damage from motor vehicle use. Unmanaged recreation, including impacts from OHVs, is one of “Four Key Threats Facing the Nation’s Forests and Grasslands” (USDA Forest Service, June 2004).

On November 9, 2005, the Forest Service published final travel management regulations in the Federal Register (FR Vol. 70, No. 216-Nov. 9, 2005, pp 68264-68291). This final Travel Management Rule requires designation of those roads, trails, and areas that are open to motor vehicle use on national Forests. Only roads and areas that are part of a National Forest Transportation System (NFTS) may be designated for motorized use. Designations are made by class of vehicle and, if appropriate, by time of year. The final rule prohibits the use of motor vehicles off designated NFTS roads, trails and areas. No National Forest, including the KNF, is exempt from this rule.

The FEIS for the KNF analyzes effects of the proposed action and alternatives on resources, including soils and soil erosion, in various sections of Chapter 3 of the FEIS.

**Public Comment:** One respondent indicates that prohibition of cross-country travel will concentrate use on routes, increase maintenance costs, and reduce rider satisfaction, and suggests that the impacts on motorized vehicle users should be analyzed in the FEIS [201].

**Response:** As discussed in the section on Society, Culture and the Economy of Chapter 3 of the FEIS, the population size of Siskiyou County has been relatively stable for many years. Most recreation use on the KNF is by local residents of the county, and most OHV use is concentrated on NFTS native-surfaced (ML 2) roads. In addition, traffic volumes on the NFTS are low. While some routes that are proposed for addition to the NFTS may experience slightly higher use after the MVUM is published, large increases in the number of vehicles on the KNF are not expected. The FEIS analyzes the impacts on motorized vehicle users and rider satisfaction in the Recreation and Society, Culture and the Economy sections of Chapter 3; the cost of maintenance, concentration and amount of motorized vehicle use are discussed in the Transportation section of Chapter 3 and Appendix C of the FEIS.

## Cultural Resources

**Public Comment:** One respondent representing several organizations expressed concern that surveys of 33 of the 43 “at risk” cultural resource sites had been deferred; therefore, information on these sites could not be used to develop alternatives [172].

**Response:** As noted in the Cultural Resources section of Chapter 3 of the DEIS, cultural resource inventory of all high priority sites had occurred before the proposed action and alternatives were developed for the KNF travel management project. As required by the Programmatic Agreement Among the USDA Forest Service, Pacific Southwest Region, USDA Forest Service Intermountain Region's Humboldt-Toiyabe National Forest, California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Process for Compliance with Section 106 of the National Historic Preservation Act for Designating Motor Vehicle Routes and Managing Motorized Recreation on the National Forests in California (Motorized Recreation PA) condition and effects assessments were conducted at sites determined to be "at risk." For those sites where no physical damage was noted or the effects were ambiguous, monitoring was prescribed. Appropriate mitigation measures as allowed under the Motorized Recreation PA were prescribed for those sites determined to have received some level of effect. This information was used to analyze alternatives in the FEIS.

**Public Comment:** One respondent representing several organizations stated that the reliance on monitoring and mitigation of harm to cultural resources is misplaced. Post-hoc monitoring and mitigation are not an adequate substitute for avoidance and protection informed by timely surveys and analysis. Without mitigation the proposed alternatives "could possibly compromise the LRMP cultural resources standards and guidelines" [172].

**Response:** At the time the DEIS was published, effects of this project were unknown on 33 cultural resource sites. All 43 sites have been visited, but evaluations have not been completed. The KNF is treating these sites as "unevaluated" for National Register of Historic Properties (NRHP) eligibility. Under the Motorized Recreation PA, NRHP evaluation can be deferred for historic properties where there has been no physical damage or effects are ambiguous, or when Standard Resource Protection Measures (SPRMs) can be prescribed. Each cultural resource site will be protected as if it was eligible until a determination of eligibility can be made. Protection measures are displayed in the Cultural Resources section of Chapter 3 of the FEIS. The purpose of an effects analysis is to determine the effects of the project activities on the resource. Using the best available science and available information, an analysis of the effects of each alternative was completed and results displayed. With the information available for the DEIS, the statement was made that "Alternative 3 would comply with all LRMP standards and guidelines. Given the current data available, the selections of alternatives 2, 4, 5, or 6, without mitigations, could possibly compromise the LRMP cultural resources standards and guidelines. However, given the small site density [number of sites] . . . involved, all mitigations measures could be met very easily." Alternative 1 (the "no action" alternative) is the only alternative that would not comply with LRMP standards and guidelines. Monitoring and phased mitigation are permitted in the Motorized Recreation PA, and in the LRMP, and will be implemented for all action



alternatives. This gives the KNF an opportunity to assess future effects, determine eligibility, and implement appropriate mitigation measures that continue to protect the site's integrity.

**Public Comment:** One respondent representing several organizations stated that the Forest Service's perfunctory description of potential mitigating measures is inconsistent with the "hard look" it is required to render under NEPA. Merely listing mitigation measures, without any discussion as to their efficacy must be held illegal under NEPA. There is absolutely no discussion in the DEIS (or in any other document) of mitigation measures' implementation, use, efficacy or anything at all beyond their mere existence [172].

**Response:** As outlined in the Cultural Resources section of Chapter 3 of the DEIS, each cultural resource is considered on a site by site basis. Mitigation measures, when deemed necessary, are developed to ensure the site maintains its integrity if it is considered eligible or unevaluated for the NRHP. An in-depth analysis for each site would be beyond the scope of this document. Mitigation measures covered by the Motorized Recreation PA are discussed in that document and are highlighted in the Cultural Resources section of Chapter 3 of the DEIS; these include the use of signage, barriers, or even complete removal of a route from designation. Where conflicts with cultural resources existed that could not be mitigations, routes were removed from consideration. Furthermore, mitigation measures are efficient and based on the best available science, as noted in the modified Cultural Resources section of Chapter 3 of the FEIS.

**Public Comment:** One respondent representing several organizations stated that the Forest Service has not fully complied with the provisions of the Historic Preservation Act 16 USC §470 sec. 106 or with Executive Order 11593 §2(a)(b) to conduct an archaeological reconnaissance [172].

**Response:** As outlined on page 234 of the DEIS, Executive Order 11593 highlights that Federal agencies "use due caution until the inventory and nomination processes are complete." The KNF has proposed monitoring and mitigations that exercise due caution until the full effects of impacts are assessed. Based on Programmatic agreements (36CFR 800.14(b)), all action alternatives in the travel management document are in compliance with the Section 106 of the NHPA and the Advisory Council on Historic Preservation's implementing regulations by being in compliance with the Motorized Recreation PA as stated in the Cultural Resources section of Chapter 3 of the FEIS. Cultural resource inventories and site assessments were completed prior to the FEIS following the provisions of the Motorized Recreation PA. Therefore, the KNF is in compliance with Section 106 of the NHPA. Section 106 states that the Federal agency will take into account the effect of the undertaking on any district, site, building, structure, or object that is included in, or eligible for inclusion in, the National Register. The KNF has done this for this travel management project. Compliance

with EO 11593 is implied when the provisions of 36 CFR 800 (in this instance, a programmatic agreement) are followed.

## Cumulative Impacts

**Public Comment:** One respondent representing several organizations suggested that by not using travel analysis to analyze the entire NFTS, the assessment of cumulative impacts is deficient under NEPA [172].

**Response:** Cumulative effects of all alternatives are identified and described in Chapter 3 of the FEIS; these are clarified and expanded from the analysis and disclosure in the DEIS for most sections of Chapter 3. The impacts of the current NFTS are included as part of the current condition of the affected environment. The cumulative effects on each resource consider the present situation of most of the KNF being open to cross-country motorized use, and add ongoing and reasonably foreseeable road actions, to determine the cumulative effects of the no action alternative. The cumulative effects of the action alternatives consider the change from the present situation in miles of unauthorized route closed to motorized vehicle use, miles of route and acres of open riding area proposed for addition to the NFTS, and ongoing and reasonably foreseeable actions, to determine the cumulative effects of actions on resources. A separate analysis of the impacts of the current NFTS is outside the purpose and need for this project.

## Dispersed Camping, Parking and Access

**Public comment:** One respondent did not want the Forest to limit parking to one vehicle length or 30 feet from a road [201]; other respondents want motorized access to all dispersed camping sites (in addition to historic use sites analyzed in the DEIS) to be permitted within 100 feet of a designated road [20, 417]. One government agency requests identification of more areas on which to pull off routes with no adverse effects to resources [417], while another respondent says the DEIS unfairly limits access to camp, park and hunt, and should extend the area to at least 300 feet [179].

**Response:** Forest Service direction does not mandate a specific distance from a designated road for parking; however, the Regional Forester for the Pacific Southwest Region has recommended either 30 feet from the center line of a designated route or one vehicle length from the side of the route as the appropriate length for driving and parking motorized vehicles. Forest Service Manual 7715.74 (1) states “the Responsible Official may include in a designation the limited use of motor vehicles within a specified distance of certain forest roads...solely for the purpose of dispersed camping ....” The authority should be used sparingly....rather, the official should designate spur roads for this purpose. This project does not affect dispersed camping opportunity. Recreation users may camp wherever they wish on the KNF, as long as they do not cause resource damage. The Forest Supervisor decided to

accommodate motorized access to dispersed camping through the designation of routes to known, historically used dispersed campsites. These spurs range from less than 100' to slightly more than 1 mile in length, and provide access to a variety of different areas. Alternatives 2, 4, 5, 6, and 7 all propose adding routes to the NFTS to accommodate dispersed camping and other dispersed recreation. This allows mobility-impaired individuals to experience camping and other dispersed recreation away from roads and developed sites.

## Enforcement Efficacy

**Public comment:** A number of respondents expressed concern about the efficacy of enforcement of the ban on cross-country travel and closing unauthorized routes not added to the NFTS (based on a number of studies in areas other than California), and asked that the FEIS describe in detail how use restrictions will be enforced, and what enforcement has been successful [172, 173, 205]; one respondent states that current workforce and budget should be enough for enforcement [395]. Other respondents stated that voluntary compliance works, OHV riders are responsible, and the KNF has enough gates and barriers to do the job [59, 201]. One agency asked that the KNF move quickly to deal with any problems created by motorized vehicle use, and display the strategy and commitment for doing so in Appendix D of the FEIS [417].

**Response:** Based on field observations, as stated in the section on Law Enforcement Assumptions Common to Effects Analyses of Chapter 3 of the FEIS, it is assumed that the majority of the motorized vehicle users on the KNF are compliant with rules. This is supported by data supplied by the State of California Off-Highway Motor Vehicle Recreation Division that suggests that 95% of users are fully compliant with rules. When the rules are clear on where OHVs can be ridden, as will be the case with the publication and distribution of the MVUM for the KNF, it is expected that at least 95% of users will follow them. As discussed in the Transportation and Recreation sections of Chapter 3 of the FEIS, the number of users on the KNF is relatively small and not expected to increase substantially, so the number of violations is expected to be small.

It is assumed that some violations will occur during the transition period as users are learning about the rules, and the KNF is committed to an education program to ensure that happens. It is also assumed that the presence of law enforcement and other agency personnel will positively affect users' behavior, as stated in Appendix D of the FEIS. The Law Enforcement section of Chapter 3 of the FEIS has been expanded to highlight the commitment of the KNF to give special emphasis to the areas in which most OHV use is likely to occur, to prioritize and quickly deal with the 1% to 5% of users who create problems, and to do so with current KNF funds and personnel (with possible additional funds from the State of California OHV grant program).

Further information on law enforcement and how it relates to travel management can be found in Appendix D of the FEIS.

## Environmental Effects of OHVs

**Public comment:** One respondent is concerned with the general environmental effects of OHV use [30]; other respondents state that effects are minimal [59], should be considered in relation to the impact of other, more substantial activities [20], and that the effects of traveling off-road for dispersed camping are minor [417].

**Response:** The environmental effects of cross-country OHV use on each resource are discussed in the various resource sections of Chapter 3 of the FEIS for the no action alternative (Alternative 1). Also, the effects of traveling on unauthorized routes that are proposed for addition to the NFTS or areas that are proposed to be open to motorized vehicles (open riding areas) are discussed for the action alternatives in Chapter 3 of the FEIS. The purpose and need for the travel management project is to examine the effects of prohibiting cross-country travel, adding routes and open riding areas, and making limited changes to the NFTS. Therefore, it may seem as though the effects of OHV use are magnified in relation to the effects of other activities but there is no intent to weigh the effects of OHV use on the environment against the effects of other activities. In the case of many resources, the effects of traveling off-road are minor. Details of the effects of OHV use on each resource are displayed in Chapter 3 of the FEIS.

**Public comment:** A number of respondents are concerned with the effect of OHV travel on intact ecosystems [FL 2, 204, 321-416, FL 418]; some mention concern with habitat fragmentation and loss of connectivity of habitat [74, 172]. Other responses express concerns with the effects on a healthy forest habitat in general [FL 2, 173, 204] and habitat for threatened, endangered, and sensitive (TES) species and management indicator species (MIS) in particular [173].

**Response:** The effects of motorized vehicle use on ecosystems and habitat are discussed in Chapter 3 of the FEIS, in Terrestrial Wildlife, Fisheries Resources, Botanical Resources, and Non-native Invasive Species sections. The Terrestrial Wildlife, Fisheries Resources, and Botanical Resources sections include analyses of effects of alternatives on TES and MIS species. Additional information is available in the summarized and referenced Wildlife BA/BE and results of consultation with US Fish and Wildlife Service (USFWS), Fish BA/BE and results of consultation with National Marine Fisheries Service, and Plant BA/BE and results of informal consultation with USFWS in the project record, located in the KNF Supervisor's Office in Yreka, CA.

## Executive Orders

**Public comment:** One respondent representing several organizations asks that the KNF take all measures to manage motorized use so as to “minimize damage to soil, watershed, vegetation and other resources” as required by Executive Orders 11644 and 11989 [172].

**Response:** The purpose of and need for the travel management process on the KNF is to find ways to make motorized use of the KNF available while protecting resources such as soil, watershed, vegetation and others as required by Executive Orders and the Travel Management Rule. The route screening process discussed in Chapter 1 of the FEIS, the action alternatives identified in Chapter 2 and results of the analysis of effects on these alternatives disclosed in Chapter 3 are based on ways of achieving this purpose and need. Alternative 3 is the most restrictive alternative for most resources. However, the direction in the Executive Orders and Travel Management rule to consider minimizing impacts to various resources does not require the Forest Supervisor to select the most restrictive alternative. As described in the Preamble to the Travel Management Rule, “[i]t is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of “minimize” would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands” (Fed Reg V.70, No. 216, p 68281).

## Geologic Resources

**Public comment:** One respondent representing several organizations is concerned that codifying user created routes on unstable land (by adding them to the NFTS) is unwise and runs afoul of the KNR LRMP and NFMA [172].

**Response:** As far as geologic hazards and resources concerns (including on unstable land), action alternatives would meet LRMP standards because they prohibit cross-country travel which is the activity with most potential impact. Consistent with the LRMP, there will be an overall reduction in open unauthorized roads through unstable land in all action alternatives, as disclosed in the Geology section of Chapter 3 of the FEIS, and effects of the travel management decision to geological resources would be minimal or beneficial. Adding routes to the NFTS does not include any changes to road width or design. Field review of unauthorized routes in unstable lands proposed for addition in any action alternative revealed no major stability issues (i.e., fill failure, landslides, or crossing failure); public-identified routes that included these features were removed from the list of potential additions as discussed in the section on how alternatives were developed of Chapter 2 of the FEIS. The routes that are added to the NFTS, if any, will receive regular maintenance consistent with the

LRMP, described in the Monitoring section of Chapter 2 of the FEIS. This maintenance is aimed at reducing drainage problems including the concentration of water onto the hillslope. Thus, the landslide potential will be reduced on the Forest scale. The routes not added to the NFTS would still affect the landscape in the short term but would begin to recover with time.

## INFRA Database

**Public comment:** One group is concerned that the INFRA database is being used to develop the MVUM, because routes that have already been decommissioned and roads designated as ML 1 are shown in the INFRA database and on DEIS maps of alternatives [202].

**Response:** The INFRA database provides a record of all roads on the KNF, even if they have been decommissioned, so that accurate reports can be produced of the activities that have occurred on KNF roads. Decommissioned roads are not shown on DEIS maps, nor on FEIS maps. Maintenance level 1 roads were inadvertently shown on DEIS maps; this error has been corrected for FEIS maps. Neither decommissioned roads nor maintenance level 1 roads as entered into INFRA will be shown on the MVUM. Information is intended to be entered into the INFRA database as actions occur but there is sometimes a time lag; corrections to the database are continuously being made. The most accurate current information will be used for the MVUM.

## Inventoried Roadless Areas (IRAs)

**Public comment:** Some respondents do not want OHV use allowed in IRAs [FL 2, 127, 321-416, FL 418]; one respondent states that current use in IRAs is appropriate [178].

**Response:** There are no unauthorized routes proposed for addition in IRAs under any action alternative (see the IRA section of Chapter 3 of the FEIS). The KNF LRMP does not prohibit OHV use within IRAs; therefore, the current condition and Alternative 1 allow cross-country travel in IRAs. Some short spurs that lie within Citizen Inventoried Roadless Areas (CIRAs as identified by The Wilderness Society) that provide motorized access to dispersed recreation sites are proposed for addition to the NFTS in Alternatives 2, 5, 6, and 7. These short routes, associated with NFTS ML 2 roads, occur at the edges of the CIRAs as discussed in the Inventoried Roadless Areas section of Chapter 3 of the FEIS.

## Maintenance

**Public comment:** Several respondents request a discussion be added to the FEIS of the opportunity to use volunteers to maintain mixed use roads, and a description of the current OHV-volunteer program and its potential to assist with the Forest's future road and trail maintenance through programs such as adopt-a-trail or adopt-a-road [20, 417].

**Response:** The KNF encourages volunteers and partners to share maintenance of NFTS roads and trails. Non-motorized trails have been maintained for years by partners and volunteers. There are currently no motorized trails, other than for over-snow vehicles, on the KNF but local user groups have stated an interest in volunteering for route maintenance once routes are designated through the travel management process. There is no current OHV-volunteer program on the KNF.

**Public comment:** A number of respondents have concerns that the KNF cannot maintain its NFTS, yet is proposing to add routes [FL 2, 74, 172, 321-416, FL 418]; several say the KNF must disclose the foreseeable cumulative and direct environmental impacts of not maintaining roads to standard [172, 352]; and several want to save maintenance dollars by reducing the operational maintenance levels of ML 3 and ML 4 roads [20, 417]. One group respondent and one agency pointed out that passenger cars (i.e., sedans) make up a very small portion of the traffic volume and asked that all maintenance level 3 roads be reclassified to maintenance level 2 [20,417].

**Response:** The majority of the road maintenance cost on the KNF is for maintenance level (ML) 3, 4, and 5 roads, and is spent on resurfacing and roadside brushing, as discussed in the Transportation section of Chapter 3 of the FEIS. Maintenance level 2 roads do not substantially add to costs. Routes proposed for addition to the NFTS as roads do not generally require active maintenance, so the additional maintenance cost is minimal once the required mitigation to prevent resource damage, if needed, is complete. Routes that can be maintained at lower operational levels of maintenance without compromising other needs, are discussed in the FEIS, Chapter 3, Transportation section, and in Appendix C. Not all ML 3 roads can appropriately be reclassified to ML 2, as is discussed in the Transportation section of Chapter 3 of the FEIS. Although passenger vehicles have evolved to include a wide variety of SUVs and extended cab pickups, an ML 3 system of arterial and collector roads to access the KNF is still required to allow those vehicles to operate safely with intervisible turnouts and adequate sight distance. This system also minimizes the risk of breaking tires, scraping brush, or taking out oil pans. See also the response to comments in the adding routes section of this appendix.

## Maps

**Public comment:** One respondent asked that routes not be shown on the Motor Vehicle Use Map (MVUM) if required mitigations have not been completed [172]; others request a schedule of when mitigations will be complete in the FEIS so that MVUM maps are correct when printed [20, 417].

**Response:** The FEIS states that no routes will be officially designated and shown on the MVUM until required mitigation is complete (Mitigations Applicable to All Action Alternatives section of Chapter 2). Official files of the KNF MVUM will be retained at the

Forest Supervisor's Office in Yreka, CA; the map will be reviewed, revised, and reissued as needed to include changes identified in the environmental analysis for future projects.

Because of the timing of the motorized travel management decision, the initial MVUM may include potential routes but specify they will not be available for use until the mitigations are complete. Mitigations will be complete before the first season of use begins after publication of the initial MVUM.

**Public comment:** One local government agency asked that the FEIS include a process by which the KNF would take the initiative to propose additions to the MVUM rather than rely on the public to do so [417].

**Response:** The KNF will take the initiative to review the MVUM, examine internally-recommended changes along with publicly-recommended changes, and determine the environmental analysis and disclosure required for decisions that would lead to revision of the MVUM as needed.

## Minimum Road System

**Public Comment:** Several respondents indicate that the KNF should identify the minimum road system needed for safe and efficient travel and for protection of KNF lands, and should close and decommission NFTS routes that are not needed [172, 205].

**Response:** This project does not analyze the impacts of the current transportation system. That analysis, and decisions on closing and decommissioning NFTS roads, are outside the purpose and need for this project. The Pacific Southwest Regional Forester has committed to begin addressing Subpart A of the Travel Management Rule within the next 18 months; that process will provide information needed to identify the minimum road system required for management of the KNF.

## Mixed Use

**Public comment:** Several respondents state that the DEIS does not adequately analyze the effects of lowering maintenance levels and increasing mixed use [172, 205] and underestimates the effects of non-highway legal vehicle use on the spread of weeds [46, 172, 173, 404]; others ask for analysis of more miles of mixed use, on most or all ML 3 and ML 4 roads [20, 171, 417], more routes on which non-highway legal vehicles can travel [201], and consideration of temporary closures to logging trucks and other large vehicles so that more miles of road would be safe for non-highway legal vehicles [417].

**Response:** The effects of mixed use, and reasons for limiting mixed use to suitable routes, is discussed in the FEIS, Transportation section of Chapter 3, and in Appendix C. An extensive mixed use analysis effort was undertaken to identify ML 3 and ML 4 routes that connect ML 2 road networks to provide seamless OHV opportunities. The analysis identified all ML 3



and ML 4 roads that are suited to mixed use and evaluated the effects of allowing mixed use on all these roads in Alternative 5. Numerous roads have been reclassified to ML 2 status over time; this effort is ongoing and will be reflected in periodic updates to the MVUM. Temporary closures and signing of roads to promote safety when large trucks will be using roads is an ongoing KNF activity; these temporary safety measures do not increase the number of miles of ML 3 and ML 4 roads that are suited to mixed use. The effects of mixed use on the spread of noxious weeds is analyzed and disclosed in the Botanical Resources and Non-native Invasive Species sections of Chapter 3 of the FEIS.

**Public comment:** Several respondents disagree with the Regional Forester's policy prohibiting non-highway legal vehicle travel on all ML 3, 4, and 5 roads, state that the correct term to permit these vehicles on roads should be "combined use" if these are considered "highways," and do not think the KNF should prohibit mixed use on any unpaved road [20, 417].

**Response:** The Regional Forester's letters addressing mixed use are clear on this issue, and the KNF will follow this direction. "Combined use" is a California Vehicle Code term while the Forest Service uses "mixed use" when non-highway legal vehicles are allowed on maintenance level 3 and 4 roads. A major concern of the Regional Forester is the safety of non-licensed drivers of non-highway legal vehicles, many of whom are under the age of 16. Therefore, he has decided that he will approve mixed use only for licensed drivers to operate non-highway legal vehicles on ML 3 roads selected for mixed use, and will not approve mixed use on ML 4 roads. The FEIS for the KNF addresses the effects of proposed mixed use on various numbers of miles for Alternatives 2, 4, 5, 6, and 7 in the Transportation section of Chapter 3 of the FEIS and the mixed-use analysis in Appendix C; results are displayed in the Transportation section of Chapter 3 of the FEIS.

## Noise or Solitude

**Public comment:** Several respondents expressed concern about noise pollution due to motorized vehicle use [30, 74], especially effects of noise on wildlife [172], horse riders [200], and quiet recreation [51]; one group and a local government suggested that speed limits in developed recreation areas would mitigate the effect of OHVs by requiring them to drive quietly [20, 417].

**Response:** The issue of noise in Wilderness and Inventoried Roadless Areas is the third significant issue discussed in Chapter 1 of the FEIS. The effects on residents of private land adjacent to the KNF are discussed in the Society, Culture and Economy section of Chapter 3 of the FEIS. Mitigations for all action alternatives include measures to reduce the effects on noise on all uses and users identified in these public comments. Analysis and disclosure of the effects of noise on quiet recreation are found in the Recreation section of Chapter 3 of the FEIS; a thorough analysis and disclosure of the effects on wildlife is presented in the Terrestrial Wildlife section of Chapter 3 of the FEIS; and the decision to eliminate Alternative

B from detailed study is partially due to visitor conflict among horses, humans, and motorized vehicles on non-motorized trails (Chapter 2 of the FEIS). The suggestion to reduce speed limits for OHVs in developed recreation areas is outside the scope of the travel management decision but may be considered outside this project.

### **Non-native Invasive Species, Noxious Weeds**

**Public comment:** A number of respondents express concerns about the spread of noxious weeds by cross-country motorized OHV travel and oppose the addition of unauthorized routes to the NFTS to reduce the spread of weeds [172, 173, 404]. One group of respondents states that the effects on weed spread of allowing non-highway legal vehicles on ML 3 roads (mixed use) have been underestimated [46].

**Response:** One of the purposes of this project is to provide management direction for where motorized vehicles can travel, thereby reducing the potential for spread of noxious weeds. Implementation of any of the action alternatives would considerably reduce the area available for OHV use and the potential for spread of weeds, as disclosed in the Non-native Invasive Species section of Chapter 3 of the FEIS. The addition of some unauthorized routes to the NFTS, effects of this on noxious weed spread, and monitoring and mitigation measures in place to limit the spread of weeds are also discussed in the Non-native Invasive Species section of Chapter 3.

**Public comment:** One respondent representing several organizations quotes the DEIS as acknowledging the significant impacts of motorized use (as opposed to route/road construction or establishment) on the spread of invasive plant species, and that weed infestations will continue to spread and the rate of spread will be increased by motorized vehicle activity; the commenter states that the DEIS also includes the statement that “proposed additions to the NFTS could have increased use which may increase impacts...” [172].

**Response:** In the DEIS the statement quoted notes that motorized use may increase on unauthorized routes added to the NFTS since cross country travel and other unauthorized routes will no longer be available for use, not that overall motorized travel use of the KNF will increase. The Transportation, Recreation, and Society, Culture and Economy sections of Chapter 3 of the FEIS disclose that there is no reason to assume that motorized use of the KNF, and especially OHV motorized use, will increase substantially since most users are local, the local area has not been growing substantially in population, and there is no information available to suggest that OHV use of the KNF will increase substantially in the future. Furthermore, any of the action alternatives would reduce the total area available for use, and thus reduce impacts compared to the current condition. The greatest threat to establishment of new weed sites is creation and repeated use of unauthorized routes; this activity will be eliminated under any of the action alternatives. The Non-native Invasive

Species section of Chapter 3 of the FEIS has been modified to include the measures currently used and planned for future use to limit the spread of weeds from road use.

**Public comment:** One respondent representing several organizations states that Executive Order 13112 requires the agency to take all “feasible and prudent measures to minimize risk of harm” to resources from management decisions that may influence the spread of invasive species. The comment indicates that the KNF’s intent to encourage off-road motorized use at the Humbug site which contains yellow star thistle does not fit with the EO. As stated on page 290 of the DEIS, invasive species located in the proposed OHV play areas “could be transported to other locations on the Forest.” It appears to the commenter that the KNF is ignoring the requirements of both the Executive Order and its LRMP by proposing to facilitate a recreational activity enjoyed by a very small percentage of Forest users that the agency anticipates will directly contribute to the spread of invasive species; proposals to add miles of unauthorized route within 100 feet of known noxious weed sites violate Executive Order 13112 [172].

**Response:** County, State, and Federal noxious weed guidance recognize that some weeds have become so abundant and widespread that eradication and control are sometimes not feasible so they put these weeds on the C-list. Yellow star thistle is on the California C-list; it is considered widespread and permanently established and only eradicable in small areas. The Forest Service has prioritized weed infestations based on the aggressiveness of spread of the species, the degree of regional concern, and the feasibility of control. Yellow star thistle is treated in areas of the KNF where control is expected to be effective. Lands within designated open riding areas will be subjected to soil displacement, and much of the acreage will be inhospitable to weeds. Loading and parking sites are the areas that have highest risk for weed introduction. Those sites will be assessed for weeds and treated as appropriate. The Humbug open riding area is located on a heavily used County road so, even if weed infestations are treated, reintroduction of weeds into these areas is highly probable. The modified Non-native Invasive Species section of Chapter 3 of the FEIS discloses feasible and prudent measures being taken to minimize the risk of harm from the spread of noxious weeds as required by Executive Order 13112. By designating motorized use routes, the KNF would substantially reduce the number of miles and acres available for motorized use on the Forest. In particular, the prohibition of cross country travel that is a component of all action alternatives would change the nature and extent of motorized use on the Forest and reduce the chances of non-native species being introduced to native plant communities. Implementation of any of the action alternatives would increase the chances that non-native species would be confined to areas near roads where they can more easily be treated. See also the response to the comment related to minimizing effects.

## Port Orford Cedar (POC)

**Public comment:** One respondent representing a number of organizations indicated concern that the DEIS did not close unauthorized routes to prevent spread of POC root disease and did not identify POC as a significant issue/resource impacted by motorized use [172].

**Response:** In response to this comment, Chapter 3 of the FEIS includes a section on Port Orford Cedar. Only one unauthorized route in the area of potential spread of POC root disease, a short spur to dispersed recreation sites, was proposed for addition to the NFTS in any action alternative. Alternatives 3, 4 and 7 do not propose to add this route to the NFTS; in the case of Alternative 7, this is specifically to prevent the spread of POC root disease.

## Purpose and Need

**Public comment:** One respondent representing several organization states that the purpose and need statement is insufficient to allow for a proper and complete analysis; travel planning must evaluate and address the environmental, social, and cultural impacts associated with unauthorized routes and currently designated roads, trails, and area as identified through the Forest-wide Roads Analysis [172].

**Response:** The purpose and need statement was developed to address Subpart B of the Travel Management Rule and is, therefore, sufficient for this process. The environmental, social and cultural impacts associated with routes proposed to be added to the NFTS in Alternatives 2, 4, 5, 6, and 7 are addressed in Chapter 3 of the FEIS. The KNF does not currently have any motorized trails for vehicles (other than over-snow vehicles) or open riding areas; the implication of the statement in the Travel Management section of Chapter 1 of the DEIS that trails allowing motorized use existed on the KNF NFTS was in error; only trails for motorized over-snow vehicles exist currently on the KNF. This has been clarified in Chapter 1 of the FEIS.

## Recreation

**Public comment:** Several respondents state that OHV use is a very small percentage of use on the Forest but creates a disproportionate amount of disturbance and resource damage; they want to make sure that the KNF does not just listen to OHV users in making a travel management decision [FL 2, 3, 204]; other respondents want to make sure that the KNF does listen to OHV users [1, 20, 417].

**Response:** As stated in the Travel Management Rule, as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of National Forest System lands. The Recreation and Society, Culture and Economy sections in Chapter 3 of the

FEIS address the possible conflicts among uses that would result from implementing each of the alternatives. The KNF is listening to all individuals and groups as indicated by the public involvement summarized in Chapter 1 of the FEIS, this response to comments on the DEIS, and modifications made and displayed in the FEIS based on public comment including the new Alternative 7 developed in part to respond to comments on the DEIS.

**Public comment:** Several respondents stated that motorized vehicle use negatively affects non-motorized recreation; they are concerned about the visitor conflicts between motorized recreation users and non-motorized users, especially visitors who seek quiet recreation (hikers, mountain bikers, wildlife-watchers and horseback riders) [74, 172, 199, 321-416, FL 418].

**Response:** The effects of motorized use on non-motorized recreation use were analyzed for all alternatives; a measurement indicator was used to compare effects of alternatives on quiet recreation. The effects of all alternatives on non-motorized recreation, quiet recreation, and resolving visitor conflicts by separating uses, are disclosed in the Recreation and Society, Culture and Economy sections of Chapter 3 of the FEIS.

**Public Comment:** One group requested an analysis of the cumulative effects of increased motorized vehicle use on the KNF due to publishing the MVUM [172]. Several respondents requested more or larger open riding areas, suggested that the open riding areas in alternatives may not safely (in regard to human and the environmental safety) meet demands for use; they asked that the FEIS analyze how many OHV users will be affected by the reduction from 1.2 million acres available for cross-country travel to 0-65 acres depending on alternative [20, 203, and 417].

**Response:** As discussed in the Transportation and Recreation sections of the FEIS, motorized vehicle use levels on the KNF are relatively small in relation to capacity, and are not likely to increase substantially in the future. There are no data available to allow accurate prediction of the future impact of publication of the MVUM. The Monitoring Applicable to All Action Alternatives section of Chapter 2 of the FEIS has been expanded to include monitoring of demands for motorized vehicle use through NVUM and public comment. If monitoring indicates substantial increases in use, the MVUM may be modified in the future based on appropriate analysis and disclosure. If demand for motorized use of open riding areas is shown to increase substantially, so that the open riding areas selected are no longer adequate in regard to human and environmental safety, the travel management decision can be modified by future projects as discussed in Chapter 2 of the FEIS. The Recreation and Society, Culture and Economy sections of Chapter 3 have been modified to expand discussions of the effects on OHV users from the prohibition of cross-country travel. There are no data available to allow accurate prediction of the number of OHV users who will be affected by this prohibition.

## Roads

**Public comment:** Several respondents requested that the Forest modify the maintenance level descriptions shown on page 344 of the DEIS and page 5-6 of Appendix C to match the correct and current Forest Service Handbook definition shown on page 2 of Appendix C [20, 417].

**Response:** Maintenance level descriptions on page 2 of Appendix C come directly from the Forest Service Handbook. For ease of understanding, these descriptions were rewritten and tailored to the KNF NFTS. An explanation of this has been added to the Transportation section of Chapter 3 and Appendix C of the FEIS.

**Public comment:** Some respondents requested a display of all 800 miles of unauthorized routes in Appendix A so the public understands why the rest were eliminated from detailed study and not proposed for designation [20, 417].

**Response:** Over the past 20 years, the KNF has accumulated an inventory of about 800 miles of unauthorized routes. Some of these routes existed on the ground and were passable by a vehicle. Others were old skid trails that could not be driven, or temporary roads that had never been taken off the inventory. Some were non-existent—roads that had been planned but had never been built, or were identified due to map errors. Forest personnel validated several hundred miles of these routes, and this information was shared with the public at a series of meetings at various locations throughout the County. Groups and individuals were asked to identify routes that were being used for off-highway travel, or were desired to be used for such travel. The public identified 497 miles of routes. These 497 miles were then evaluated to identify any resource, safety and affordability concerns that might be associated with designating them as available for motorized use. Routes that emerged from this screening process as potential additions to the NFTS were field verified; some were found to be no longer identifiable on the ground or not useable for any motorized access while others were not suitable for addition to the NFTS due to resource concerns that could not be reasonably mitigated. The screening process is summarized in Chapter 2 of the FEIS and available in the project record located at the KNF Supervisor's Office in Yreka, CA.

**Public comment:** Several respondents suggested that maintenance levels on all roads be based on the percentage of type of vehicle use; they indicated that it makes little sense to keep roads at a higher maintenance level if passenger cars are a minor component of the traffic (just 2% on the KNF, and that all paved roads (asphalt, chip seal, etc.) should be ML 5 [20, 417].

**Response:** Although passenger vehicles have evolved to include a wide variety of SUVs and extended cab pickups, a maintenance level 3 system of arterial and collector roads to access the KNF is still required to handle these vehicles safely with intervisible turnouts and adequate sight distance. This system also minimizes the risk of damage to tires or undercarriages. The major differences in maintenance costs between ML 3 and ML 2 roads

are roadside brushing for safety and additional culvert cleaning (due to the safer in-sloped road surface on ML 3 roads). Neither of these tasks is dependent on vehicle type. Another difference is more frequent rock-fall removal on ML 3 roads which helps with vehicle ground clearance issues but also improves safety by not requiring vehicles to navigate rocks and other debris to avoid vehicle damage.

Maintenance level 5 roads are specifically defined as double-lane paved roads; KNF ML 4 roads that are paved or chip-sealed serve administrative and developed recreation sites or were surfaced for dust abatement for large equipment related to timber sales years ago. When roads that are surfaced for dust abatement reach the end of their service life, consideration will be given to grinding and blending the surfacing back to an aggregate surface. These roads will then fit the criteria for lower operational maintenance levels.

**Public comment:** Several respondents identified a seeming discrepancy in the available mileage of NFTS roads shown on pages 21, 351, and 352 of the DEIS [20, 417]

**Response:** The number of miles shown on page 21 of the DEIS is incorrect and has been corrected in the FEIS. The number on page 351 is correct for the entire Klamath National Forest. The number of miles in the table on page 352 omits the miles maintained on the portion of the KNF that is managed by the Six Rivers NF (the Ukonom Ranger District) as is noted in the paragraph immediately preceding the table. The table heading has been modified to reflect this information in the Transportation section of Chapter 3 of the FEIS.

**Public comment:** A number of respondents suggest that the Forest should close system routes, primarily through decommissioning, to save maintenance costs and prevent resource damage from lack of route maintenance [FL 2, 17, 172, 204, 321-416, FL 418].

**Response:** The purpose and need for the current action is to implement Subpart B of the travel management regulations and address unmanaged motorized cross-country travel, not to close NFTS routes. Maintenance costs and the KNF strategy for meeting maintenance needs using current budget allocations are discussed in the Transportation section of Chapter 3 of the FEIS. See also earlier responses to comments on adding routes and open riding areas.

**Public comment:** A respondent representing several organizations suggests that NFTS roads identified in the KNF Roads Analysis as having both low value and high risk should be closed and decommissioned in this travel management decision [172].

**Response:** The purpose and need for the current action is to implement Subpart B of the travel management regulations and address unmanaged motorized cross-country travel, not to close NFTS routes. Roads analyses, including the KNF Forest-wide Roads Analysis, describe conditions at a given time, discuss findings, give recommendations, and outline strategies for

road management; they do not make decisions. Decisions on closing and decommissioning roads require separate environmental analyses, beyond the scope of the current travel management planning effort. Since the 2002 publication of the KNF Forest-wide Roads Analysis, a number of decisions to close and decommission roads on the KNF have been made. The KNF will continue its strategy for road decommissioning independent of this project.

**Public comment:** A respondent representing several organizations stated that if the Forest Service continues to propose opening decommissioned and/or closed roads for motorized use, the rationale for the initial closure needs to be carefully re-analyzed and disclosed in the EIS [172].

**Response:** No decommissioned roads are proposed for opening to motorized use in this project. The proposed action in the DEIS included changing the maintenance level on 2 roads from ML 1 (closed) to ML 2 (open for motorized use). After scoping was complete on the proposed action, it was determined that one road (40N51) that had been closed to ameliorate road surface concerns and promote wildlife habitat (after a fire in 1987 had removed most of the vegetation surrounding the road) was reopened in 2007 after determining the closure was no longer needed. Road maintenance performed when the road was opened on an emergency basis for wildfire access had addressed road surface concerns and the vegetation surrounding the road had grown sufficiently to protect it from erosion and provide wildlife habitat and cover. Thus, only one road (41S10) was considered for a change from ML 1 to ML 2 in other action alternatives. This road near Doe Peak had been constructed on a railroad grade of less than 3% slope with large radius curves to accommodate trains when the land was in private ownership. After the land was acquired to be part of the KNF, the road was gated but it was never officially closed by a Forest Order. The road provides a loop opportunity for motorized vehicles to a high place with a scenic vista and does not have any documented soil erosion or connectivity to streams. Detailed information is available in the project record located at the KNF Supervisor's Office in Yreka, CA.

## Route-specific Comments

**Public Comment:** One group requested that several routes and one open riding area be added to the KNF NFTS [203]; another respondent requested that one specific route be added [320]. A group requested that specific roads and road segments in South Fork Indian Creek that are impassible due to landslides be physically closed and not be shown as open for motorized use on the MVUM [46].

**Response:** The request for additional routes was analyzed and results discussed in the Alternatives section of Chapter 2 of the FEIS in the discussion of Alternatives Considered but Eliminated from Detailed Study. The route suggested for addition by an individual was determined to be located on another National Forest; the comment was forwarded to that



Forest. The South Fork Indian Creek Road is now shown in INFRA as ML 1. It is physically closed by a barrier, and will not be displayed as being open for motorized use on the MVUM; this is discussed in Chapter 2 of the FEIS under Alternative 7.

**Public comment:** Several respondents suggest specific routes for addition to the NFTS, and request no season of use restrictions on added routes and open riding areas [203, 320].

**Response:** Some of the suggested routes were evaluated in Steps 1-3 of the travel management process outlined in Chapter 1 of the FEIS; a determination was made to remove them from consideration in this process after field verification due to resource, safety, or maintenance cost concerns (some were found to be no longer identifiable on the ground or not useable for any motorized access). Others were evaluated between the DEIS and FEIS; results of these determinations are as follows:

About 1.4 miles of routes that form loop opportunities outside the Juniper Flat play area were identified in one comment. These routes were not part of the original inventory. Review of the routes indicates that vehicle use is adversely affecting several cultural resource sites. Therefore, these routes were not considered for addition to the NFTS in any action alternatives but are discussed in an alternative considered but eliminated from detailed analysis (Alternative F). One non-motorized trail to Siphon Lake was identified. As noted in Alternative B, another alternative considered but eliminated from detailed analysis, non-motorized trails were not intended for motorized use and would require engineering review, design, and potentially substantial reconstruction to accommodate that use. Adding motorized use to equestrian and foot trails would create conflicts between motor vehicles and non-motorized recreational uses of NFS land, and create safety issues associated with those conflicts. Therefore, this trail was not considered for addition to the NFTS in any action alternative.

Two trails were recommended by a local OHV riding group for use by all vehicles, Trails 4608301 and 46083401. These routes are proposed for use by motorcycles only due to the steepness and width of the routes and their ability to provide a different type of recreation experience. Trail 45080208, identified early in the process, was eliminated from any action alternative because it provided a duplicate riding opportunity with an adjacent ML 2 road. Trail 46082603 was identified on a map but could not be located on the ground, nor could any wheel tracks be located in the vicinity, so this trail was eliminated from any action alternative.

Routes 7J002.1A, 7J002.2, 46073201 and 46073205, recommended for addition to the NFTS by a local OHV riding group, would require extensive reconstruction prior to being available of use so they were eliminated from any action alternative. Route 7J002.6 is recommended for addition to the NFTS as a road in Alternatives 5 and 7. Route 45N08X crosses into private land; there is no right-of-way for public access on this route so it was eliminated from any

action alternative. Route 45N28.7 on Montana Peak was eliminated from consideration due to concerns for wildlife and rare plants. Route 7J002.3 was eliminated because it is a dead-end spur that does not access any recreation feature or opportunity. Roads 46N16 and 46N16A are proposed for highway-legal vehicles only because of concerns from private landowners in the area regarding conflicts with OHVs. Through an oversight, the Vesa Bluff trail was never mapped in the current travel management process so the effects of designating it as part of the NFTS were never analyzed. This route may be considered for addition to the NFTS in a future project decision. Road 45N41.2 is already open to motorized vehicle use as part of the NFTS; it was inadvertently included in the proposed action (Alternative 2) but the error was caught before publication of the DEIS so it is not part of any other action alternative. In Alternatives 5, 6, and 7, route 45N88.2 is proposed for addition to the NFTS; this would provide a loop opportunity with the open road 45N41.2.

The local OHV riding group also requested no season of use restrictions on routes 8J002.3c, 8J002.3 segment 1, 8J002.3 segment 3 and 7H002.2. Season of use restrictions were placed on these routes due to concerns about deer winter range. The dates for the season in which use will be allowed were coordinated with the California Department of Fish and Game, as disclosed in the Terrestrial Wildlife section of Chapter 3 of the FEIS.

**Public comment:** One respondent representing a group suggests that the some routes identified for addition to the NFTS as ML 2 roads also specify that they are for motorized use only by vehicles less than 50” in width and wonders why these were not considered as 4WD trails or motorized trails for all vehicles [203].

**Response:** The DEIS, Appendix A, included an error in the placement of routes; all routes proposed for addition to the NFTS for use by vehicles less than 50” in width should have been in the table for addition to motorized trails. This error has been corrected in Appendix A of the FEIS. These routes are proposed for vehicles less than 50” in width to provide riding opportunities; they were not considered for 4WD or all vehicles due to the width of the existing unauthorized route surface, and resource concerns if the routes were widened. Routes added as roads will be available to most vehicles.

## Safety

**Public comment:** One group stated the FEIS must address public health and safety issues, suggested an analysis of potential injuries related to open miles of route and the effect of law enforcement on safety; and asked that the FEIS disclose the potential for fatal injuries resulting from alternatives that allow OHV use in remote locations [172].

**Response:** The Motorized Mixed Use (MMU) analysis, included in Appendix C and summarized in the Transportation section of Chapter 3 of the FEIS, considered the safety aspects of designating routes for different vehicle types. Crash history for the KNF was

disclosed as part of that analysis. No crashes or injuries have ever been documented on the KNF between users of OHVs and highway legal vehicles as far back as records are kept. If safety concerns arise in the future and are documented through monitoring, mitigations may be implemented or modifications made to the MVUM as discussed in Chapter 2 of the FEIS.

**Public comment:** One respondent was concerned about safety if motorized use was allowed on non-motorized trails [200].

**Response:** Allowing motorized use on non-motorized trails was discussed in an alternative considered but eliminated from detailed study (Alternative B) in Chapter 2 of the FEIS. This alternative does not meet the purpose and need, and was eliminated from detailed study partially because of safety concerns. None of the alternatives considered but eliminated from detailed study, including Alternative B, will be selected for implementation.

### Scope of the Project

**Public comment:** Several respondents state that the proposal focuses too much on analyzing the potential impacts of designating new unauthorized routes, and not enough on assessing the impacts of NFTS roads [172, 205].

**Response:** The identified need for action is to implement the prohibition on cross-country travel contained in Subpart B of the travel management regulations, and to identify for potential addition to the NFTS those unauthorized routes that are well-situated and provide important access and recreation opportunities. The FEIS appropriately focuses on the direct, indirect, and cumulative effects associated with the proposed action and alternatives. The NFTS, changes to the NFTS due to ongoing and reasonably foreseeable actions, and state, county, other Federal and private roads were considered in the cumulative effects analyses in the FEIS as appropriate.

**Public comment:** A number of respondents ask that the scope be expanded to include effects of the NFTS, especially of current roads and trails with known impacts [172, 202, 205, 321-416, FL 418].

**Response:** The scope of the proposal is directly related to the purpose and need for action. Please see the responses provided to comments in the sections on adequacy of analysis and purpose and need.

### Seasonal Closures

**Public comment:** One agency stated that the DEIS does not provide information on the routes on which wet-weather closures will occur, related environmental impacts of allowing use on routes during wet weather, and effectiveness of such closures in protecting the environment [205]; another respondent states that closures should be based on weather-related criteria, and not set

dates [201]. One agency requested longer periods of wet weather seasonal closure [205]; a local government wanted a shorter seasonal closure for the Humbug open riding area and roads and motorized trails in the Humbug drainage [417].

**Response:** To provide clarity to motorized vehicle users, and improve voluntary compliance with the travel management decision, the seasons during which motorized use will be allowed will be included on the MVUM in advance and not vary daily. The dates for seasonal use of the open riding area, roads and motorized trails in the Humbug drainage correspond to the dates recommended by the State of California, Department of Fish and Game to assure provision of critical winter habitat for deer. The season of use for motorized vehicles other than over-snow vehicles on routes that are used by over-snow vehicles in the winter are set to separate types of motorized use and minimize user conflicts. The season of use for routes near Swainson's hawk nests is set to avoid disturbance to nesting hawks. Seasons of use are not proposed to directly mitigate the effects of open routes on sedimentation; indications that this might occur in the DEIS were incorrect. Seasonal wet weather operating restrictions for NFTS roads are currently imposed only to protect road surfaces and roadbeds from rutting, and are only used for heavy vehicles such as logging trucks. Wet weather closures may be indirectly helpful in preventing soil movement into streams because protecting the road surface and roadbed from rutting can keep some soil from eroding. However, soil that is displaced from road surfaces in dry seasons can be mobilized by rain into streams during wet seasons (if there is connectivity between the sediment source and the stream) as discussed in the Hydrology section of Chapter 3 of the FEIS. The section on Mitigations Applicable to All Action Alternatives of Chapter 2 of the FEIS has been modified to correctly portray information on seasons of use. A display of mitigations for each proposed addition to the NFTS is presented in Appendix A of the FEIS by route and by action alternative. Season of use for each route (the inverse of seasonal closure) is displayed on Tables A-3, A-4, and A-5.

## **Soils—Productivity, Compaction and Erosion**

**Public comment:** Several respondents expressed concern with potential soil compaction and erosion from unauthorized roads that are open for motorized use [17], from cross-country travel [74], and from open riding areas being proposed [172]. One respondent representing several organizations states the Forest Service must demonstrate it is protecting soil resources, and cites studies that have documented that erosion of native surfaced roads is increased by traffic [172]. Another respondent is concerned that prohibiting cross-country travel will concentrate motorized use on fewer miles of routes [201], and one respondent thinks cross-country travel should continue to exist providing there is no resource damage such as erosion [171].

**Response:** Soil compaction on, and soil erosion from, unauthorized routes open to motorized use is discussed in the Soils section of Chapter 3 of the FEIS. A number of recent studies cited in the Hydrology and Soils sections have concluded that volume of motorized traffic is

directly correlated to the degree of soil erosion from road surfaces, and that motorized traffic is the greatest contributor to soil erosion of all varieties of traffic (horse, foot etc.). All action alternatives reduce the number and miles of unauthorized routes on which soil compaction or erosion will occur, and prohibit cross-country travel that could lead to establishment of more routes. Unmanaged cross-country travel has the potential to disturb soils almost anywhere on the 1.2 million acres open for off-road travel; it is uncertain which areas may be disturbed or where new routes may be located, and so effects to soils can't be precisely addressed. Allowing cross-country travel only in small open riding areas minimizes the area on which soil compaction can take place; these open riding areas can be placed on sites that keep sediment from entering streams or other bodies of water. Overall, prohibiting cross-country motorized travel Forest-wide, and limiting the number of unauthorized routes proposed for addition to the NFTS to those that have minimal resource concerns, reduces the area affected by soil compaction and erosion. There may be a potential for increased soil erosion on some routes if motorized traffic is concentrated on these routes. However, designating these routes as part of the NFTS assures they will be monitored for soil erosion as part of the road and trail monitoring discussed in Chapter 2 of the FEIS. Based on the results of this monitoring, maintenance or mitigation can be prescribed to address resource concerns.

**Public comment:** Soil productivity is mentioned by one respondent representing several organizations who has concerns that the DEIS states that proposed NFTS additions need not abide by NFMA and KNF LRMP soil productivity standards [172].

**Response:** NFTS roads and other dedicated facilities such as developed campgrounds and administrative sites are exempt from soil productivity standards cited in the KNF LRMP and Forest Service Region 5 Soil Management Handbook Supplement (R5 FSH Supplement 2509.18-95-1), so unauthorized routes proposed for addition to the NFTS would also be exempt. All action alternatives prohibit motorized use on the majority of miles of unauthorized routes (from 81% to 100% depending on the alternative); these closed routes will be covered by soil productivity standards under all action alternatives.

**Public comment:** One respondent representing several organizations is concerned with proposals to add routes and open riding areas to the NFTS in areas with high or very high Erosion Hazard Rating (EHR), particularly in the Humbug drainage in which the KNF found a high degree of soil compaction and rutting on slopes [172].

**Response:** Erosion Hazard Rating (EHR) is a broad evaluation of soil's susceptibility to erosion and the potential for soil displacement (movement off site), as discussed in the Soils section of Chapter 3 of the FEIS. Soils with high or very high EHR ratings are primarily on the west side of the KNF. Most of the miles of route proposed for addition to the NFTS are on the east side of the KNF. Of the 0 to 36 miles proposed for addition to the NFTS on soils

with high and very high EHR ratings in various action alternatives, almost all are in the Humbug drainage. The Soils and Hydrology sections of Chapter 3 of the FEIS have been expanded to include more information about the potential effects on soils in the Humbug drainage; the Soils section includes specific mitigation for routes with documented soil erosion. As disclosed in Chapter 3 of the FEIS, all action alternatives would improve soil conditions over the current condition; soils on the 81% to 100% of miles of unauthorized routes closed to motorized vehicle travel would begin to recover, although recovery of soils with High and Very High EHR ratings would take a very long time (50 years or more).

## Terrestrial Wildlife

**Public comment:** A number of respondents were concerned that the proposed action would result in increased impacts to wildlife [51, 74, 173, 321-416, FL 418], and expressed the desire to the KNF to address the value of wildlife [198]; one respondent praised Alternative 6 for its treatment of wildlife [178].

**Response:** The Wildlife section of the FEIS addresses potential impacts to a variety of wildlife species. General conclusions are: (1) this project does not remove or degrade habitat; (2) prohibition of cross-country travel will result in less disturbance to wildlife, and will result in beneficial effects for all species analyzed, and (3) implementation of any action alternative may effect, but is not likely to adversely affect and will have beneficial effects for Threatened or Endangered species (see summary of determinations listed in the Terrestrial Wildlife section of Chapter 3 of the FEIS, and Biological Assessment included in the project files).

**Public comment:** One respondent requested that off road vehicles should be used only in areas without critical wildlife habitat values [17].

**Response:** Some of the action alternatives propose designating routes within NSO critical habitat. There would be no effects to habitat, and effects would be limited to vehicle noise considered to be a continuation of the current situation. The U.S. Fish and Wildlife Service has concurred that implementation of this project would have No Effect on designated critical habitat for Threatened or Endangered species. The project record includes the Wildlife BA/BE on which this determination is based.

**Public comment:** One respondent representing several organizations stated the KNF should not rely on the obviously illegal 2008 NSO critical habitat re-designation [172].

**Response:** An analysis for NSO using the 1992 habitat layer was conducted between DEIS and FEIS in response to this comment. Results are included in the Terrestrial Wildlife section of Chapter 3 of the FEIS.

**Public comment:** One respondent representing several organizations stated that Alternative 6 proposes to designate and encourage motorized use on routes within LSRs and Critical Habitat Units (CHUs) (DEIS page 194.) This alternative also authorizes routes within 0.25 mile of two NSO activity centers (DEIS page 193). The DEIS discloses that user-created motorized routes are currently sparsely used, suggesting that owls near these trails may not be habituated to noise disturbance. Alternative 6 would also authorize 4.2 miles of user-created routes within LSRs and CHUs, potentially affecting NSO dispersal, foraging, and nesting. The Rogue-Siskiyou National Forest concluded on pages II-33 and II-47 of its DEIS that limiting OHV use near spotted owl sites would contribute to the avoidance of owl harassment. No such acknowledgement is present in the KNF DEIS [172].

**Response:** Alternative 6 was developed to correct errors and omissions in the original proposed action. While it includes routes within NSO critical habitat, the U.S. Fish and Wildlife Service has concurred that adoption of any action alternative would constitute a No Effect for critical habitat for Threatened and Endangered species.

**Public comment:** One respondent representing several organizations states that rather than analyze, disclose, avoid, or mitigate the impacts of foreseeable noise harassment from proposed motorized use on NSO reproductive success and behavior patterns, the DEIS arbitrarily defines such noise harassment as “ambient” based on the contention that motorized vehicles have been used on these routes for years. DEIS page 182. The commenter points out that page 347 of the DEIS reveals that proposed routes “tend to have very low traffic volumes” and page 261 of the DEIS informs the reader that “proposed additions to the NFTS could have increased use...” [172].

**Response:** Current traffic levels on these routes (and on most roads within the KNF) are low. The assumption (used for all resource analyses) that vehicle use on designated routes will not measurably increase in the near future is based on demographic and NVUM data displayed in the Society, Culture and the Economy and Recreation sections of the FEIS. Most motorized recreation use on the KNF is by local residents, and the population of Siskiyou County has not grown appreciably in the last decade. The assumption used in the wildlife analysis was that use of unauthorized routes by vehicles has established an ambient noise level for local wildlife that is low and sporadic in nature.

### **Pacific fisher**

**Public comment:** One respondent representing several organizations noted that the discussion of the Pacific fisher is lacking. The Forest Service has not disclosed the impacts of motorized use on this at-risk species [172].

**Response:** Effects to fisher are discussed in the late-successional species group in the Terrestrial Wildlife section of Chapter 3. The wildlife analysis considered fisher habitat to be the same as NSO late-successional habitat, and effects to that habitat type are fully disclosed. There are no known fisher denning sites identified on the KNF, so there is no way to determine the miles of routes within 0.25 mile of such sites.

**Public comment:** One respondent representing several organizations stated that the USFWS warranted but precluded findings contain a detailed review on the conservation status of the fisher, including a comprehensive analysis of threats to the continued existence of the species (69 Fed. Reg. 18770, 18770 (April 8, 2004)). For example, FWS noted that "habitat loss and fragmentation appear to be significant threats to the fisher. Forested habitat in the Pacific coast region decreased by about 8.5 million acres between 1953 and 1997." Id. at 18780. "Forest cover in the Pacific coast is projected to continue to decrease through 2050, with timberland area projected to be about 6 percent smaller in 2050 than in 1997." Id. "Thus fisher habitat is projected to decline in Washington, Oregon, and California in the foreseeable future." Id. [172].

**Response:** This project does not propose removal of any habitat, and in fact would promote long-term recovery of unauthorized routes in late-successional habitats. Prohibiting cross-country motorized travel from over 102,000 acres of late successional habitat will eliminate the potential for more user-created routes that could fragment, degrade or remove this type of habitat.

**Public comment:** One respondent representing several organizations noted the FWS status review discloses that "[v]egetation management activities such as timber harvest and fuels reduction treatments . . . can destroy, alter, or fragment forest habitat suitable for fishers." Id. at 18778. "A number of studies have shown that the fisher avoids areas with little forest cover or significant human disturbance and conversely prefers large areas of contiguous interior forest." Id. at 18773. "The fisher's need for overhead cover is very well documented. Many researchers report that fishers select stands with continuous canopy cover to provide security cover from predators." Id. "Fishers probably avoid open areas because in winter open areas have deeper, less supportive snow which inhibits travel, and because they are more vulnerable to potential predators without forest cover." Id. "Furthermore, preferred prey species may be more abundant or vulnerable in areas with higher canopy closure." Id. [172]

**Response:** This project does not remove late-successional habitat or affect canopy closure. The amount of human disturbance associated with designated routes will not increase in the foreseeable future (see discussion in the Society, Culture and Economy and Recreation sections). The prohibition on cross-country motorized travel will remove vehicle use from 102,000 acres of late-successional habitat, and allow over 400 miles of undesignated routes to



revegetate. The effects on prey species for fisher and marten are addressed in the environmental effects section of the Wildlife analysis in Chapter 3.

**Public comment:** One respondent representing several organizations noted there is no mention made in the DEIS of the impacts of increased noise and human disturbance on the remaining fisher habitat. While the DEIS (at page 173) acknowledges many fisher detections over the past decade on the west side of the Klamath NF, the DEIS simply assumes that publication of the MVUM will not result in additional motorized harassment of the species [172].

**Response:** The assumption (used for all resource analyses) that vehicle use on designated routes will remain at currently low levels and will not measurably increase in the near future is based on demographic and NVUM data displayed in the Society, Culture and the Economy and Recreation sections of the FEIS. Ambient noise along newly-designated routes will continue to be sporadic. Depending on the alternative selected, less than 1% of late-successional habitat on the KNF could continue to be affected by vehicle noise. The potential for human disturbance on over 102,000 acres of late-successional habitat accessible by vehicles will be substantially reduced as this acreage is made unavailable for cross-country motorized travel.

## Unauthorized routes

**Public comment:** One respondent suggested that motorized use should be prohibited on all unauthorized routes and they should be replanted with native vegetation [17].

**Response:** Prohibition of use of all unauthorized routes was analyzed (Alternative 3). The Transportation section of Chapter 3 of the FEIS discusses the plan to allow most unauthorized routes that are not designated as part of the NFTS to revegetate naturally. This will keep the cost of restoration of routes to a minimum and allow the vegetation that is native to the area to grow. As also discussed in that section, and in the Mitigations Applicable to All Action Alternatives section of Chapter 2 of the FEIS, some limited physical restoration and naturalization treatments may occur at the point of closure for unauthorized routes if needed as mitigation for resource or visitor conflict concerns. Natural materials will be used if such mitigation actions are undertaken.

## Visual Quality

**Public comment:** One respondent representing several organizations finds the assertion in the DEIS that all alternatives meet visual quality objectives (VQOs) is unsupported by documentation [172]; another respondent states that roads take away from natural beauty [382].

**Response:** Visual Quality Objectives (VQOs) for the KNF were established in the LRMP. These VQOs define minimum acceptable thresholds for landscape alternations from an

otherwise natural-appearing forest landscape. The Retention VQO requires that landscapes remain natural-appearing; the Partial Retention VQO requires that alterations remain visually subordinate. The Modification and Maximum Modification VQOs allow alterations to dominate the landscape. The analysis contained in the Visual Quality section of Chapter 3 of the FEIS includes the compliance of each alternative with the Retention and Partial Retention VQOs. The analysis also includes the use of indicators that examine the effect of each alternative on the KNF's key viewsheds, and miles of unauthorized routes available for revegetation or visual recovery.

## Water, Watersheds and Hydrology

**Public comment:** A number of organizations and individuals have concerns about the general effects of motorized vehicle use on clean water [FL 2, 17, 74, 172, 198, 205, 366]; others ask for protection of watersheds [326, 328, 414] and emphasize the important value of clean water [173].

**Response:** The Hydrology section of Chapter 3 of the FEIS analyzes and discloses the impacts on water quality and watersheds of prohibiting cross-country travel and adding miles of unauthorized routes (0 to 92 miles depending on the alternative) to the NFTS. This section of the FEIS also discloses how the alternatives would meet the requirements of the Clean Water Act (CWA) and objectives of the Aquatic Conservation Strategy (ACS) from the KNF LRMP.

**Public comment:** One respondent representing several organizations stated that the DEIS fails to adequately address the cumulative impacts on water resources which result from the incremental impact of action alternatives added to the conditions of the watersheds, cumulative impacts of foreseeable road projects, individual components of alternatives and cumulative effects of individual components taken together. This respondent also questions the adequacy of Appendix B as a cumulative effects analysis [172].

**Response:** The Hydrology section of Chapter 3 of the FEIS has been modified to clarify the cumulative effects of action alternatives on water resources. As noted in that section, the effects of ongoing and reasonably foreseeable road projects are beneficial for water resources on the west side of the KNF due to removal of 50 miles of road from the NFTS (48 miles through road decommissioning and 2 miles by converting a road to a non-motorized trail). Road additions on the east side of the KNF have little to no effect on water due to soils, topography, and interior draining. The current condition of watersheds is discussed in the affected environment portion of the Hydrology section of Chapter 3. The additive effects of each alternative and ongoing/reasonably foreseeable road-related actions are discussed for each alternative under cumulative effects. It has been clarified throughout the document that Appendix B is a listing of ongoing and reasonably foreseeable projects, not an analysis of cumulative effects.

**Public comment:** One respondent representing several organizations stated that a quantified detailed disclosure of the cumulative impacts from concrete proposals to increase the number of system roads in riparian reserves is required by NEPA, and they are concerned that the proposed action would designate a significant mileage of unauthorized routes for motorized use in riparian reserves [172].

**Response:** As noted above, the Hydrology section of Chapter 3 of the FEIS has been modified to clarify the cumulative effects of action alternatives on water resources. The direct and indirect effects of prohibiting cross-country travel, and of adding unauthorized route miles in riparian reserves (0 to 23 miles), and in key watersheds (0 to 8 miles), to the NFTS, are analyzed and disclosed; the cumulative effects of these actions added to the effects of ongoing and reasonably foreseeable road projects are disclosed under cumulative effects of each alternative. Resulting route densities are discussed for all alternatives. See also the response to the third comment under the adding routes and open riding areas section of this appendix.

**Public comment:** One respondent representing several organizations stated that the Forest Service must manage public lands in an ecologically sustainable manner that protects water resources, streams, streambanks, and shorelines, and show how it is protecting these resources [172].

**Response:** As discussed in the Hydrology section of Chapter 3 of the FEIS, all of the action alternatives represent substantial reductions in road mileage in riparian reserves, and reductions in road density in most watersheds where additions to the NFTS are proposed to occur. Compliance with law, regulation and policy is also disclosed in the Hydrology section of Chapter 3 of the FEIS. See also the response to comments under Soils.

**Public comment:** One respondent representing several organizations is concerned that proposed cumulative impacts in Upper Humbug “would probably exert a detectable change in hydrologic response” [172]; an agency requests that the FEIS show that motorized use will not impair water in the Humbug area [205].

**Response:** The direct and indirect effects of adding unauthorized routes to the Upper Humbug Creek watershed are analyzed and disclosed for all action alternatives in the Hydrology section of Chapter 3 of the FEIS. Direct and indirect effects include a (potentially) detectable positive change in hydrologic response; this is because there are currently more miles of unauthorized route in the Upper Humbug Creek watershed than in any other watershed, and the impact of closing most or all of these routes to vehicles could possibly be detectable. In other watersheds, the impact of closing routes is much less and, therefore, less likely to be detectable. The Hydrology section of Chapter 3 of the FEIS has been modified to clarify the effects of actions on open road density, and possible hydrologic

impact. In addition, the FEIS includes mitigations to the Humbug drainage that would further reduce the effects of added routes on water, detailed in the Soils section of Chapter 3 of the FEIS. Also, as stated under cumulative effects of action alternatives in the Hydrology and Fisheries sections of Chapter 3 of the FEIS, the long term effects of decreasing road density in action alternatives would be beneficial to water and fish.

**Public comment:** One respondent representing several organizations stated that the DEIS acknowledges that motorized use is the predominate cause of sediment production from native surface roads but is proposing to add 24 miles of unauthorized routes to the NFTS in hydrologically sensitive areas and wonders how this contributes to attainment of ACS objectives [172].

**Response:** Once routes have been created, motorized use (motorized traffic volume) is the predominant cause (more than hikers, horses or bicycles) of soil displacement, and of sediment production if the routes have hydrological connectivity to streams or other bodies of water. The amount of sediment created by addition of native surfaced routes to the NFTS depends on a number of factors such as the amount of motorized use, terrain, soils, slope and drainage patterns as well as connectivity to water. The Hydrology section of Chapter 3 of the FEIS includes information about the number of routes that would be added to the NFTS in riparian reserves in each action alternative, the number that would be closed to motorized use (81% to 100% depending on the alternative), and the resulting road density. The determination of how the action alternatives contribute to the attainment of the ACS objectives of restoring water quality is also disclosed in the modified Hydrology section of Chapter 3 of the FEIS.

**Public comment:** One respondent representing several organizations is concerned that the DEIS generally limits analysis to the impacts of route establishment as opposed to the foreseeable impacts of increased motorized use on additional routes in riparian reserves, and states that this is particularly important for those routes proposed in watersheds that already exceed their Threshold of Concern (TOC) [172].

**Response:** As displayed in the Hydrology section of Chapter 3 of the FEIS, none of the analyzed watersheds in which more than 1 mile of unauthorized routes are proposed to be added to the NFTS currently exceed the TOC, and the action alternatives all represent substantial reductions of miles of open route in riparian reserves. The modified Hydrology section emphasizes that almost all ongoing and reasonably foreseeable road actions on the west side of the KNF remove miles of road from the NFTS, which will positively affect water quality in the long term. The disclosure of cumulative effects of alternatives has been modified to clarify the added effects of the ongoing and reasonably foreseeable road actions to the effects of the travel management project. As noted earlier in this section, there is no

information available that indicates increased motorized use of the KNF will occur in riparian reserves.

**Public comment:** One respondent representing several organizations noted that the Klamath River is 303(D) listed for temperature and nutrients and proposed for sediment listing, and the Salmon River is also listed for both temperature and sediment. The commenter asks how increasing the number of system roads in hydrologically sensitive areas and riparian reserves will meet the agency's obligations delineated in the Basin Plan and meet CWA requirements for rivers that are 303(D) listed for sediment [172].

**Response:** The Hydrology section of Chapter 3 of the FEIS includes information about the watersheds in which unauthorized routes are proposed for addition to the NFTS that could influence the Klamath and Salmon Rivers. As stated in that section of the FEIS, designating some routes and leaving the others to revegetate over time will reduce open route density in all watersheds considered. The number and density of routes in riparian reserves will also decrease, helping meet Clean Water Act requirements to mitigate non-point source pollution to meet requirements of the Basin Plan. Prohibiting cross-country travel will eliminate the potential for creation of new routes in these areas.

**Public comment:** One respondent representing several organizations noted that the DEIS indicates that only a small proportion of unauthorized routes were field reviewed, and contends the public and decision-maker cannot rely on the numbers presented in the Hydrology section of Chapter 3 [172].

**Response:** An error was made in the Hydrology section of the DEIS regarding field review information; this error has been corrected in the FEIS. Field review of unauthorized routes has occurred throughout the travel management process. As noted in the alternative development section of Chapter 2 of the FEIS, the KNF Interdisciplinary Team (IDT) members performed the initial screening of unauthorized routes to rule out those with serious resource concerns and those that did not meet the purpose and need of the project. A proposed action was formulated after the initial screening with field review occurring simultaneously. At the end of these reviews, more than ¾ of the unauthorized routes had been dropped from consideration. Additional field review (including review of approximately 30 miles of unauthorized routes, most in the Humbug drainage) occurred after the Notice of Intent was published in 2005; results of this additional review, along with public comment on the NOI, led to the development of action alternatives to the proposed action. Additional GIS analysis and further field review occurred between DEIS and FEIS; this field review, in addition to public comments on the DEIS, led to development of another action alternative (Alternative 7).

**Public comment:** An agency requests that the KNF consult with the North Coast Regional Water Quality Board (NCWQCB) on this project and add more Best Management Practices (BMPs) and mitigation [205].

**Response:** The KNF has been in discussions with the NCWQCB on various proposed road-related activities and has agreed to in-stream monitoring of activities as discussed in the Hydrology section of Chapter 3 of the FEIS. Proposed mitigations to reduce the potential effects of motorized use are displayed in Chapter 2 of the FEIS, in the Soils and Recreation sections of Chapter 3 of the FEIS, and in the project record located in the KNF Supervisor's Office in Yreka, CA. The project record includes the BMPs included in the Regional Water Quality Management Plan, as discussed in the Hydrology section of Chapter 3 of the FEIS.

## Wild and Scenic Rivers

**Public comment:** One respondent stated that no OHVs should be allowed near Wild and Scenic Rivers [17]; another group expressed concern about unauthorized routes being proposed for addition to the NFTS in or adjacent to Wild and Scenic River Corridors [172].

**Response:** As discussed in the Recreation section of Chapter 3 of the FEIS, there are rivers on the KNF that are formally included within the National Wild and Scenic River (WSR) system as "Wild," "Scenic," or "Recreational." None of the routes considered for addition to the NFTS are within the river corridors designated as Wild or Scenic. Some routes are proposed for addition with Recreational corridors; this action would be consistent with direction in the KNF LRMP as long as beneficial uses are maintained. The Hydrology and Fisheries sections of Chapter 3 of the FEIS discuss maintenance of beneficial uses and conclude that addition of routes meets requirements of the Aquatic Conservation Strategy and the Clean Water Act. The Visual Quality section determined that all action alternatives meet Forest visual quality standards.

## Wilderness Areas

**Public comment:** Several respondents stated that no OHVs should be allowed close to wilderness [199, 200]; one respondent suggested that no OHV use should occur within 2 miles of a wilderness boundary [17].

**Response:** Motorized vehicle use is prohibited in Wilderness. As part of the Mitigations Applicable to All Action Alternatives section of Chapter 2 of the FEIS, wilderness boundaries will be clearly signed when any motorized route approaches within ¼ mile so that motorized vehicle users will know they are approaching a Wilderness. This will help reduce inadvertent incursions into Wilderness areas. The Recreation analysis in Chapter 3 of the FEIS includes an indicator to compare the effects of proposed additions to the NFTS on wilderness. This indicator (miles of route within ½ mile of a wilderness boundary) was developed using

information from scientific studies and reports listed in the references section of Chapter 4 of the FEIS. There is no agency direction to surround wilderness with buffers or to limit activities such as motorized use areas outside the wilderness boundaries.

## List of Respondents to the DEIS

Name	Address	City	Sta	Zip
Robert Jump	33 Coleman Dr.	San Rafael	CA	94901
Mac Sutherlin	430 ashland st	Ashland	OR	97520
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Chad Derosier	3232 SE 8th Ave	Portland	OR	97202
Mick Bress	General Delivery	Gold Beach	OR	97444
Dee Decker	2922 Grizzly Dr.	Ashland	OR	97520
Art & Carol Buck	116 Church Street	Ashland	OR	97520
jean-Guy Martin		Applegate	OR	97530
Liisa Wale	115 Lincoln St. #2	Ashland	OR	97520
Selene Veltri Veltri	495 Carol St.	Ashland	OR	97520
George Lescher	347 High St.	Ashland	OR	97520
Maura Hayes	435 Holly Street #15	Ashland	OR	97520
Beth & Jon Carlson Levin				
Barbara Hughey	4599 Thompson Cr.Rd.	Applegate	OR	97530
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George & Frances Alderson	112 Hilton Ave.	Baltimore	MD	21228
Stuart O'Neill	441 beach street	Ashland	OR	97520
Cate Schoenharl	415 E. Nerton St.	Talent	OR	97540
Sylvia Milligan, Chr. ROC	4000 Beacon Drive	Anderson	CA	96007
Leslie Cox		Gold Hill	OR	97525
Heidi & Dudley Finch Haehlen	P.O.Box 1444	Jacksonville	OR	97530
Marcia McDuffie			CA	
Edith Montgomery	156 Blue Heron Lane	Ashland	OR	97520
Debbi Catalina	19765 williams hwy	Williams	OR	97544
Fred Lifton	4314 NE Grand Ave.	Portland	OR	97211
Gayla Barrows	2020 Martin Dr.	Medford	OR	97501
Ayani mikasi	408 creel	Talent	OR	97540
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Tim Ream				
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Arnica Wertheimer				
Nathan Pundt	2014 Rose St	Berkeley	CA	94608
Scott Harding	PO Box 202	Ashland	OR	97520
Ara Johnson	133 Nutley St.	Ashland	OR	97520
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Janice Brotman	281 E. Main St. Apt.3	Ashland	OR	97520
Heidi Wolfe	12695 Hwy 238	Applegate	OR	97520
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Denise Lytle	73 Poplar St.	Fords	NJ	08863
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Bill Mullen	39 Wendy Road	Trumbull	CT	06611
Karen Phillips	1150 1/2 SW Lee Lane	Grants Pass	OR	97526
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Duane Bowman	2131 Little Applegate Rd.	Jacksonville	OR	97530
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Cathy Robinson	774 Willow Springs Dr.	Mobile	AL	36695
Erich Reeder	41 Eastwood Dr.	Medford	OR	97504
Sally Buttshaw	300 Luman Rd. Space 173	Phoenix	OR	97535
Susan Deles	2801 sykes creek rd	Rogue River	OR	97537
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Courtlandt Jennings	523 drager st	Ashland	OR	97520
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Robin Strangfeld	900 Hillview Dr	Ashland	OR	97520
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Marie Kimokeo Goes	120 Ridge Rd	Ashland	OR	97520
Lynda Sirianni	558 Holly St.	Ashland	OR	97520
Jime Matoush	457 Holly St.	Ashland	OR	97520
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Ken Morrish	913 Park St	Ashland	OR	97520
Mari Black	273 Normal	Ashland	OR	97520
Joan Ballenger	911 Harmony Ln	Ashland	OR	97520
Lisa Pavati	961 Harmony Ln	Ashland	OR	97520
Marc Vinicky	903 Harmony Ln	Ashland	OR	97520
Paul Giancarlo	916 Garden Way	Ashland	OR	97520
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Russell White	422 Ray Ln.	Ashland	OR	97520
Michael Barnard	445 Normal Ave.	Ashland	OR	97520
Jennifer G. Watt	635 Fordyce St.	Ashland	OR	97520
Rebekah Davis	495 Ray Ln.	Ashland	OR	97520
Paul James Martin	490 Ray Lane	Ashland	OR	97520
Pat Smith	635 Fordyce St.	Ashland	OR	97520
Susan N. Silva	1774 Homes Ave.	Ashland	OR	97520
Kay Kendall	1025 wildwood way	Ashland	OR	97520
Michael Stapleton	P.O.Box 6418	Eureka	CA	95502
Gail Lyons, Pres. Back Cnty Horsemen	P.O.Box 461	Etna	CA	96027
Ron Hipkiss	5008 Alan Court	Carmichael	CA	95608
Stan Van Velsor, ORV Coord, TWS	655 Montgomery, Ste.1000	San Francisco	CA	94111
Jim Lipke, SCORR President	P.O. Box 1925	Yreka	CA	96097
Jan Lytjen	1025 Park Street	Ashland	OR	97520
Kathleen Goforth, Mgr, Env.Review, EPA	75 Hawthorne Street	San Francisco	CA	94105
Lily G. Stephen	P.O. Box 1211	Mt. Shasta	CA	96067
Ruth Nelson-Moore	200 High Street	Mt. Shasta	CA	96067
Perry Sims	309 Ackley Ave.	Mt. Shasta	CA	96067
John Velti	P.O. Box 785	Mt. Shasta	CA	96067
Dawn Fazende	300 E. Lake	Mt. Shasta	CA	96067
Jack Talbott	P. O. #17	McCloud	CA	
Joel Goopman	P.O. Box 890	Mt. Shasta	CA	96067
Johnny Peil	P. O. Box 195	Dunsmuir	CA	96025
Anne Holding	9534 Swigart Rd.	Montague	CA	96064
Laurel Gerber	P.O. Box 1712	Mt. Shasta	CA	96064
A Johnson	6905 Linville Drive	Weed	CA	96094
Doug Tedsen	511 Lennon St.	Mt. Shasta	CA	96067
Robert Kirth	P.O. Box 41	Mt. Shasta	CA	96067
Kelly Jones	272 Senate Drive	Pacheco	CA	
Kathryn S. Ariel	2650 Amy Ct.	Mt. Shasta	CA	96067
S Hase	870 Shasta Circle	El Dorado Hills	CA	95762
J Rodaughn	1203 Nixon Rd	Mt. Shasta	CA	96067
Polly Elliott	2920 Hwy 99 South	Ashland	OR	97520
Dina Ederer	1310 Ramona Dr.	Mt. Shasta	CA	96067
Delia L. Ann	607 A. Pine St.	Mt. Shasta	CA	96067
Jona Peters	P.O. Box 165	Tahoe Vista	CA	96148
Al Noon	12086 E. Fork Rd	French Gulch	CA	96003
[name illegible]	[no address]			
Katharine Scovik	5808 Deer Creek	Mt. Shasta	CA	96067
Grace Cohen	4 Hillcrest	Ashland	OR	97520
Jonathan Wickes	P.O. Box 465	Williams	OR	97544
Bayla Greenspoon	300 Terry Lynn Ave.	Mt. Shasta	CA	96067
Ken Jimenez	1025 Mott Airport Rd.	Mt. Shasta	CA	96067
Alexandra Saadi	418 S. Mt. Shasta Blvd.	Mt. Shasta	CA	96067
Bryan Jamieson	418 A S. Mt. Shasta Blvd.	Mt. Shasta	CA	96067
Larry Zanetti	708 Mill St.	Mt. Shasta	CA	96067
David Bell	709 S. Mt. Shasta Blvd.	Mt. Shasta	CA	96067
Sarabecca Barnett	1915 Audubon Rd.	Mt. Shasta	CA	96067
Eric Bragg	514 Mill St.	Mt. Shasta	CA	96067
Jennifer Wills-Christian	502 Berry St.	Mt. Shasta	CA	96067

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Noel Wolfe	505 Berry St.	Mt. Shasta	CA	96067
Jasper Alt	210 Sisson St.	Mt. Shasta	CA	96067
Herb McLane	[no address]	Mt. Shasta	CA	96067
Jason Parett	610 Brush St.	Mt. Shasta	CA	96067
Stefanie Goebel	412 Alder St.	Mt. Shasta	CA	96067
Kristin Mazzei	288 Harrison St.	Ashland	OR	97520
Marguerite Forni	P.O. 785	Mt. Shasta	CA	96067
Wayne G. Kingsbury	324 Pony Trail Drive	Mt. Shasta	CA	96067
Jule Schult	16021 Arrowhead Pl.	Weed	CA	96094
Jan diStefano	508 Meadow Ave.	Mt. Shasta	CA	96067
Barbara Clark	9431 Rocky Rd.	Weed	CA	96094
Poga Anders	6034 Deer Creek Rd.	Mt. Shasta	CA	96067
J Purtle	909 McCloud	Mt. Shasta	CA	96067
Kimberley E. Harper	301 Perry St.	Mt. Shasta	CA	96067
Robert Carr	1821 Eddy Dr.	Mt. Shasta	CA	96067
Holly Christiansen	334 Bridge St.	Ashland	OR	97520
Alexander Mitchell & family	1312 Pine Grove Dr.	Mt. Shasta	CA	96067
Carol White	19358 Maple Ave.	Weed	CA	96094
Shawn Raley	623 Caroline Ave.	Mt. Shasta	CA	96067
Zach R. Shriver	623 Caroline Ave.	Mt. Shasta	CA	96067
Anna Klimaszewski	425 Oakway Rd.	Mt. Shasta	CA	96067
Lisa C. Watson	709 S. Mt. Shasta Blvd.	Mt. Shasta	CA	96067
Eugene Woody	5327 Lake Shastina Drive	Weed	CA	96094
JoAnna Woody	5327 Lake Shastina Drive	Weed	CA	96094
Gabe Groom	812 Holiday Court	Mt. Shasta	CA	96067
Robin Clayton	558 Everitt Memorial Hwy.	Mt. Shasta	CA	96067
Richard Linn	510 Sara Bell	Mt. Shasta	CA	96067
Allison Roach	515 Hercules Dr.	Mt. Shasta	CA	96067
Catherine M. Preus	610 Hercules	Mt. Shasta	CA	96067
Jena Sinclair	515 Hercules Dr.	Mt. Shasta	CA	96067
Kate Yorke	P.O. Box 1383	Mt. Shasta	CA	96067
Ruthmari Rumell	508 Everitt Memorial Hwy.	Mt. Shasta	CA	96067
John Thelender	510 Lennon	Mt. Shasta	CA	96067
Jennifer Payton	P.O. Box 632	Mt. Shasta	CA	96067
Nadine Aeth	115 North A St.	Mt. Shasta	CA	96067
Emily Nesbitt	303 McCloud Ave.	Mt. Shasta	CA	96067
Brian Santos	307 McCloud Ave.	Mt. Shasta	CA	96067
Jan Cole	1605 Sunset	Ashland	OR	97520
January Lenning	882 Garden Way	Ashland	OR	97520
Dr. Vicki T. Purslow	780 Oakway Cir.	Ashland	OR	97520
Kyra Damashert	221 Liberty St.	Ashland	OR	97520
P. All	562 Louis St.	Talent	OR	97540
M. Pamela Nelson	1286 Woodland Dr.	Ashland	OR	97520
Ramona Gorman	P.O. Box 3087	Ashland	OR	97520
Gerald Cavanaugh	560 Oak St.	Ashland	OR	97520
Dona J. Meade-Beauregard	369 W. Verde St.	Ashland	OR	97520
Laura Seefairchild	776 Oak St.	Ashland	OR	97520
Annette Lennerz	717 Oak St.	Ashland	OR	97520
John Fisher-Smith	245 Oak St.	Ashland	OR	97520
Sandra Ward	700 Oak St.	Ashland	OR	97520

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Matt Dopp	1655 Parker St.	Ashland	OR	97520
A. Bonney	750 Park St.	Ashland	OR	97520
John Gorman	P.O. Box 3087	Ashland	OR	97520
Ken Brown	595 Lit Way	Ashland	OR	97520
Kelly Weisteipl	595 Ray Ln.	Ashland	OR	97520
John Baxter	595 Ray Lane	Ashland	OR	97520
Tom Harasin	973 Oak St.	Ashland	OR	97520
David Campanelli	131 Oak Meadows Pl.	Ashland	OR	97520
David B. Faudoin	835 Oak St.	Ashland	OR	97520
Ash McFadden	895 Oak St.	Ashland	OR	97520
Joseph Kauth	1 Corral Ln. #13	Ashland	OR	97520
Pamala Joy	472 Walker Ave.	Ashland	OR	97520
Rikki Ruth	467 Walker Ave	Ashland	OR	97520
Diana McFarland	P.O. 981	Ashland	OR	97520
Cody Callavan	1628 Parker St.	Ashland	OR	97520
Daniel Hamnett	935 Harmony Ln.	Ashland	OR	97520
Bruce Comstock	858 Blackberry Ln.	Ashland	OR	97520
Pam Greenblatt	501 Allison St.	Ashland	OR	97520
Suzanne Steele	2959 Diane St.	Ashland	OR	97520
Chris Hjerrilo	2958 Diane St.	Ashland	OR	97520
Karen McClintock	2790 Diane St.	Ashland	OR	97520
M Miclusees	2810 Diane	Ashland	OR	97520
Daniel Greenblatt	49 N. Main St.	Ashland	OR	97520
Barbara Broziic	865 Blackberry Ln.	Ashland	OR	97520
Roger Armstrong	866 Blackberry Ln. #10	Ashland	OR	97520
Dana Carter	866 Blackberry Ln. #10	Ashland	OR	97520
Nathale Prettyman	193 Oak Meadow Pl.	Ashland	OR	97520
Dean Day	915 Oak St.	Ashland	OR	97520
Patrice Thatcher-Stephens	640 Oak St.	Ashland	OR	97520
Dee W. Sanders, Trinity Lumber				
Richard Saretsky	20720 E. Walnut Cyn. Rd.	Walnut	CA	91789
Tom Hazelleaf	4656 Fir Ave.	Seal Beach	CA	90740
Deborah Filipelli, Ph.D.	P.O. Box 341	the sea ranch	CA	95497
Sandra Money	3461 Laguna Ave	oakland	CA	94602
Thomas Brustman	2013 Devita Ct	Walnut Creek	CA	94595
Lee St. John	21900 Barton Rd #170	Grand Terrace	CA	92313
Terelle Terry	1701 "O" Street, Apt. 101	Sacramento	CA	95811
Nancy & Ken Macy	15485 Bear Creek Road	Boulder Creek	CA	95006
F. Hammer	1490 Chestnut St	San Francisco	CA	94123
Jeris Turner	3273 Nyeland Ave. #F	Oxnard	CA	93036
Michael Terry	503 West Rustic Road	Santa Monica	CA	90402
George Ball	4818 w 9th st.	inglewood	CA	90301
Richard Schuh	1346 Legs Ln	Sonoma	CA	95476
Pamela Osgood	349 Church St.	San Francisco	CA	94114
Daniel Richards	216 Agnus Drive	Ventura	CA	93003
Yuko Nakajima	63 Oakvale Ave.	Berkeley	CA	94705
M. A. McDonald	2653 2nd Ave #3	Sacramento	CA	95818
Linda Tiffany	Stuart St.	Berkeley	CA	94705
Eugene Craig	5267 Camden Ave #152	San Jose	CA	95124
Mark Feldman	137 Winchester Dr	Santa Rosa	CA	95401

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Sandra Christopher	1425 N. Kenwood St.	Burbank	CA	91505
Phyllis Elliott	608 San Vicente Blvd.	Santa Monica	CA	90402
Greg Corning	76 Bernal Heights Blvd.	San Francisco	CA	94110
William & Hiroko Mattsson	131 Giorno Ave.	Ukiah	CA	95482
Kathleen Seeley	57588 Mesa Drive	Yucca Valley	CA	92284
Carmen Rodriguez	4159 Dyer Street	Union City	CA	94587
Evelyn Cummings	8429 Macawa Ave	San Diego	CA	92123
Patricia Wilson	P.O. Box 7516	Spreckels	CA	93962
Chris MacKrell	5642 Walnut Ave	Long Beach	CA	90805
Mary Markus	10462 Ramona Way	Garden Grove	CA	92840
Susan Trivisonno	2810 Oak Estates Ct.	San Jose	CA	95135
Gary Falxa	1615 Swanson Ln	Eureka	CA	95503
Randall Tyers	63 Oakvale Ave.	Berkeley	CA	94705
Brigida Williams	290 Van Buren Sat. #B23	Monterey	CA	93940
David Harris	1678 Buena Vista St	Ventura	CA	93001
Siddharth Mehrotra	3230 Orange Drive	Camarillo	CA	93010
Kristin Hurley	13243 Aubrey St.	Poway	CA	92064
Kathleen Watson	8190 Grape Ave	Forestville	CA	95436
Mimi Routh	P. O. Box 1687	Mt. Shasta	CA	96067
Carolyn Dennison	12622 Haster Street	Garden Grove	CA	92840
Dwight Johnson	62 Estates Dr.	Orinda	CA	94563
Michael Molamphy	1746 Grand Canal Bl. 15	Stockton	CA	95207
Nancy Piotrowski	3450 Geary Blvd. Ste.#107	San Francisco	CA	94118
Deniz Bolbol	PO Box 5656	Redwood City	CA	94063
Lisa Shinn	14270 Morningside	Atascadero	CA	93422
Harriet Hill	1444 McFarlan Street	Eureka	CA	95501
Freda Hofland	27070 Sherlock Road	Los Altos Hills	CA	94022
McLane Downing	2150 Pacific Beach Dr.#232	san Diego	CA	92109
Dan & Mary Agnes Hardie	1749 Ducker Court	Concord	CA	94519
Mark Bartleman	1984 Del Mar Ave	Laguna Beach	CA	92651
Phillip Cripps	35898 Calle Raphael	Cathedral City	CA	92234
R.H. Kroell	66 S. Ventura Ave. #207	Ventura	CA	93001
Iginio Fontana	PO Box 542	Saint Helena	CA	94574
Betty Lewis	1955 W. Bayshore Dr.	Anaheim	CA	92801
Aileen Carissimi	200 Prospect Ave.	Los Gatos	CA	95030
Melissa Bryan	2200 Village Court #32	Belmont	CA	94002
Russell Ridge	P.O. Box 396	Point Reyes Station	CA	94956
Dana Thompson	23060 Evergreen Lane	Los Gatos	CA	95033
Robyn Cooper	4745 Nova Drive	Santa Cruz	CA	96062
Thomas Aldridge	296 s 13 st	san jose	CA	95112
Gloria Aluzas	682 Black Hills Dr.	Claremont	CA	91711
Noah Schlager	116 barn road	tiburon	CA	94920
Ellen Franzen	970 Jones Street	Berkeley	CA	94710
Luci Evanston	752 Glenview Dr #209	San Bruno	CA	94066
Carolyn Barkow	7844 Whelan Dr	San Diego	CA	92119
Martin Schulz	2703 Adrian St.	San Diego	CA	92110
Sarah Dixon	PO Box 6235	Malibu	CA	90264
P. Daniels	288 shirley blvd.	arcata	CA	95521
A Bonvouloir	PO Box 70185	Sunnyvale	CA	94086
Dorine Kramer	3373 Patricia Ave	Los Angeles	CA	90064

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Donald Wallace	1719 Cold Canyon Road	Calabasas	CA	91302
Michael Heister	6320 Carpenter Ave	North Hollywood	CA	91606
Rita Williams	2275 Hidalgo Ave	Los Angeles	CA	90039
Dorian Sarris	2167 Turk	San Francisco	CA	94115
Larry Dennis	35170 Garcia Street	Union City	CA	94587
Richard Dimatteo	236 Kalmia #107	San Diego	CA	92101
Dona van Bloemen	1117 3rd Street Apt. 5	Santa Monica	CA	90403
Doug Thompson	PO Box 800	Morongo Valley	CA	92256
Dan Hitt	p.o. box 542	palo alto	CA	94302
Eric Simpson	828 Ocean Crest Rd.	Cardiff-by-the-Sea	CA	92007
Marcy Anzardo	14515 Leffingwell Rd. #41	Whittier	CA	90604
Jack Fris	5113 La Calandria Way	Los Angeles	CA	90032
Richard McCombs	P.O. Box 9	Big Bear City	CA	92314
Olivia Benavidez	206 clearview place	Felton	CA	95018
Howard Cohen	3272 Cowper Street	Palo Alto	CA	94306
Robert Ewing	2272 William Ct.	McKinleyville	CA	95519
Matthew Emmer	4143 Via Marina	Marina del Rey	CA	90292
Jeanne Michaels	3068 C Via Serena North	Laguna Woods	CA	92637
Matthew Reid	1311 Pine St	Calistoga	CA	94515
Patricia McQuade	426 Vivienne Dr	Watsonville	CA	95076
Chris Ashton	9357 Lake Murray Bl. Unit B	San Diego	CA	92119
Jonathan Dirrenberger	403 Fair Oaks Apt 1	San Francisco	CA	94110
Kathleen Lawton	847 W. Spain St.	Sonoma	CA	95476
Julie Payne	11681 Valleycrest Rd.	Studio City	CA	91604
Teresa Nemeth	1189 Harrison St.	Santa Clara	CA	95050
A W Jaymes	316 Goldfinch Way	Livermore	CA	94551
Ric Constales, NR, Siskiyou County	P.O. Box 750	Yreka	CA	96097
Form Letter-TWS	655 Montgomery, Ste. 1000	San Francisco	CA	94111